APPENDIX 3.8B

Correspondence Summary

Date	Form	Participants	General Topic(s)	
December 12, 2014	Letter	From USACE St. Louis District to Native American tribes	Initiation of formal tribal consultation. Same letter was sent to 28 tribes, requesting that they review the project alternatives and inform agency of any concerns such as sacred sites, traditional cultural properties, or other issues tribes may have.	
January 7, 2015	Response Letter	From the Peoria Tribe to USACE St. Louis District	Requested to participate as a consulting party.	
January 9, 2015	Response Letter	From the Delaware Nation to USACE St. Louis District	No comments or objections to the project. Requested to be informed if any archaeological sites are identified during the course of the project.	
January 15, 2015	Response Letter	From the Kickapoo Tribe of Oklahoma to USACE St. Louis District	No comments or objections to the project. Requested to be informed if any archaeological sites are identified during the course of the project.	
January 21, 2015	Response Email	From the United Keetoowah Band of Cherokee Indians in Oklahoma to USACE St. Louis District	No comments or objections to the project. Requested to be informed if any archaeological sites are identified during the course of the project.	
January 22, 2015	Response Email	From the Osage Nation to USACE St. Louis District	Requested to participate as a consulting party.	
April 22, 2015	Letter	From Advisory Council on Historic Preservation (ACHP) to USAF and NGA	Requested information on the Section 106 process	
June 15, 2015	Letter	From USACE Kansas City District to Missouri SHPO	Formal initiation of Section 106 consultation for Natior Geospatial Intelligence Agency Action. Requested concurrence on determinations of eligibility for the 3 Missouri alternatives.	
June 15, 2015	Letter	From USACE Kansas City District to Illinois SHPO	Formal initiation of Section 106 consultation for Nation Geospatial Intelligence Agency Action. Requested concurrence on determinations of eligibility for the St. Clair County alternative.	
June 19, 2015	Letter	From USACE Kansas City District to ACHP	Invitation to participate in Section 106 consultation for National Geospatial Intelligence Agency Action.	
June 29, 2015	Letter	From USACE to Kansas City District to Missouri SHPO	Invitation to face-to-face consultation meeting on July 8, 2015 to initiate the development of the Programmatic Agreement.	
June 29, 2015	Letter	From USACE Kansas City District to Illinois SHPO	Invitation to face-to-face consultation meeting on July 8 2015 to initiate the development of the Programmatic Agreement	
June 30, 2015	Response Letter	From Missouri SHPO to USACE Kansas City District	SHPO reviewed the reports submitted to them on June 1 2015 and found that architectural resources that had been previously determined potentially eligible were missing from the findings. Additional information requested.	
July 1, 2015	Email	From USACE Kansas City District to 3 consulting parties (Landmarks Association of St. Louis, Missouri Alliance for Historic Preservation, and Tillie's Corner)	Invitation to face-to-face consultation meeting on July 8, 2015 to initiate the development of the Programmatic Agreement.	
July 2, 2015	Response Letter	From Illinois SHPO to USACE Kansas City District	Agreed to participate in Section 106 consultation.	
July 27, 2015	Email	From USACE Kansas City District to all consulting parties	Transmitted meeting minutes and action items from July 8 consultation meeting.	

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APPENDIX 3.8B

Correspondence Summary

Date	Form	Participants	General Topic(s)	
August 20, 2015	Response Letter	From Illinois SHPO to USACE Kansas City District	Provided concurrence on determinations of eligibility for the St. Clair County alternative.	
August 24, 2015	Letter	From USACE Kansas City District to St. Clair County Board	Request to respective landowners/public entities to assist with cultural resources mitigation planning efforts.	
August 25, 2015	Letter	From USACE Kansas City District to St. Louis Development Corporation	Request to respective landowners/public entities to assis with cultural resources mitigation planning efforts.	
September 11, 2015	Response Letter	From Missouri SHPO to USACE Kansas City District	Identified two areas for which SHPO was unable to make determinations of eligibility. Requested additional information including occupant history and architectural and archaeological reports for the 3 sites under consideration.	
October 7, 2015	Letter	From USACE Kansas City District to Missouri SHPO	Provided results of a geoarchaeology survey conducted at the Fenton site. Requested concurrence on the finding that no deeply buried prehistoric cultural deposits are likely to occur due to age and the impacts of plant construction and demolition.	
October 9, 2015	Response Letter	From USAF to ACHP	Provided additional information per a request sent by th ACHP in a letter dated April 22, 2015.	
November 3, 2015	Response Letter	From Missouri SHPO to USACE Kansas City District	Provided concurrence that there is no potential for intacarchaeological sites at the Fenton site.	
November 6, 2015	Email	From USACE Kansas City District to ACHP	Request to confirm ACHP's intent regarding participation in the Programmatic Agreement consultation process.	
November 10, 2015	Response Letter	From Illinois SHPO to USACE Kansas City District	SHPO reviewed the mitigation plan and found it acceptable.	
November 16, 2015	Response Letter	From USACE Kansas City District to Missouri SHPO	Additional documentation for the St. Louis City site was requested by the Missouri SHPO on September 11, 2015. In response to this request, a report with a more detailed historical context and photographic documentation was provided to SHPO.	
December 8, 2015	Response Letter	From ACHP to Director of the NGA	Agreed to participate in consultation to develop a Programmatic Agreement.	
December 8, 2015	Response Letter	From ACHP to Security and Installations Directorate, NGA	Notification that the ACHP will participate as a consulting party. Provided additional comments on how to proceed under the regulations. Acknowledged NGA as the lead federal agency.	
December 11, 2015	Response Letter	From the Osage Nation Historic Preservation Office to USACE St. Louis District	Identified the Mississippi River Trail as a tribal cultural resource near the St. Louis City site. Concurred with all findings presented in the cultural resource survey reports for the Fenton and Mehlville sites, but did not concur with the findings for these sites presented in the EIS. Concurred with findings of effect for the St. Louis City and St. Clair County sites in the EIS.	
January 5, 2016	Response Letter	From USACE Kansas City District to Missouri SHPO	Submitted the revised scope of work for an initial archaeological survey to be performed at the St. Louis City site. Included responses to initial comments from the Missouri SHPO.	
January 20, 2016	Letter	From Missouri SHPO to USACE Kansas City District	Confirmed receipt of the revised proposal for archaeological testing for the St. Louis City site.	

ES093014083520ATL



DEPARTMENT OF THE ARMY ST. LOUIS DISTRICT CORPS OF ENGINEERS 1222 SPRUCE STREET ST. LOUIS, MISSOURI 63103-2833

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December 12, 2014

Engineering and Construction Division Curation and Archives Analysis Branch

Chairman John Berrey Quapaw Tribe of Indians P.O. Box 765 Quapaw, Oklahoma 74363

Dear Chairman Berrey:

This letter addresses the new National Geospatial-Intelligence Agency (NGA) campus that will be constructed in the St. Louis region. The NGA is a federal agency that delivers geospatial intelligence information to military professionals and first responders. This agency is both an intelligence agency and a combat support agency for the Department of Defense. Many of these missions are accomplished from the current NGA 2nd Street facilities located in St. Louis, Missouri, where over 3,000 people are employed.

The current facility is functionally obsolete and needs major modernization. After a series of planning studies it was determined that a new facility would be the most cost effective way to address their needs. NGA commissioned a site location study to identify potential locations that would meet minimum site requirements. Site selection criteria included, but were not limited to, a new location within 25 miles of its current location, within two miles of a state or interstate highway, and at least 50 acres in size. After reviewing 186 initial sites, four sites were brought forward for more detailed analysis. Three sites are located in Missouri and one site is located in Illinois. At this time there is no preferred alternative location. See Attachments 1-4 for map locations of the four proposed sites.

- 1. Fenton: 1050 Dodge Drive, Fenton, Missouri (southwest of St. Louis)
- 2. Mehlville: 13045 Tesson Ferry Road, St. Louis, Missouri (south of St. Louis)
- 3. North St. Louis City: near the intersections of Cass and North Jefferson Avenues
- 4. St. Clair County: along Interstate 64, adjacent to the northeast boundaries of Scott Air Force Base (east of St. Louis)

The U.S. Army Corps of Engineers, Kansas City District, has a military mission, and this project falls within its mission boundaries. As a result, they will be the lead District and manage most aspects of this project, including the preparation of the Environment Impact Statement (EIS) in accordance with National Environmental Policy Act (NEPA) guidelines. Under NEPA, if a federal agency proposes a major action that could impact the environment it is required to prepare an EIS.

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The Corps of Engineers is also beginning the tribal consultation under Section 106 of the National Historic Preservation Act. The Kansas City District has delegated the St. Louis District to manage all tribal consultation, correspondence, and coordination for this project. All correspondence or face-to-face consultation meetings will originate from the St. Louis District. We request that your tribe look at the four potential areas, and if you have interest in any of the areas, we ask that you enter into formal consultation with the St. Louis District. Any concerns such as sacred sites, traditional cultural properties, or other issues tribes may have will be addressed through consultation.

Ms. Roberta Hayworth, Native American Coordinator at the St. Louis District, is responsible for tribal consultation. The Corps requests that you contact Ms. Hayworth by February 27, 2015, regarding your involvement, or non involvement, with this project. If you have any questions regarding tribal consultation, please contact Ms. Roberta Hayworth at (314) 331-8833: e-mail: roberta.l.hayworth@usace.army.mil. A copy of this letter has been furnished to Mr. Joseph Blanchard.

4005

Sincerely,

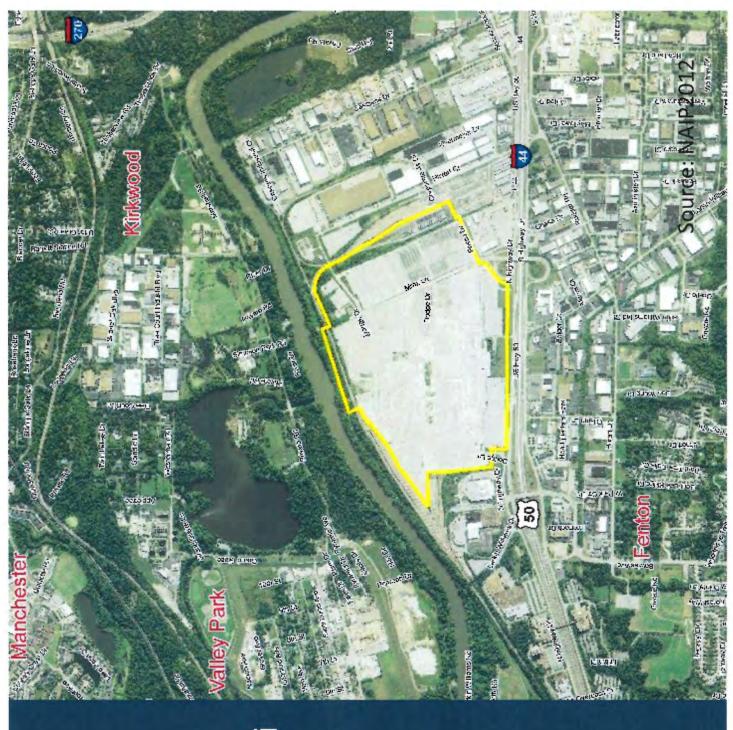
Michael K. Trimble, Ph.D. Chief, Curation and Archives

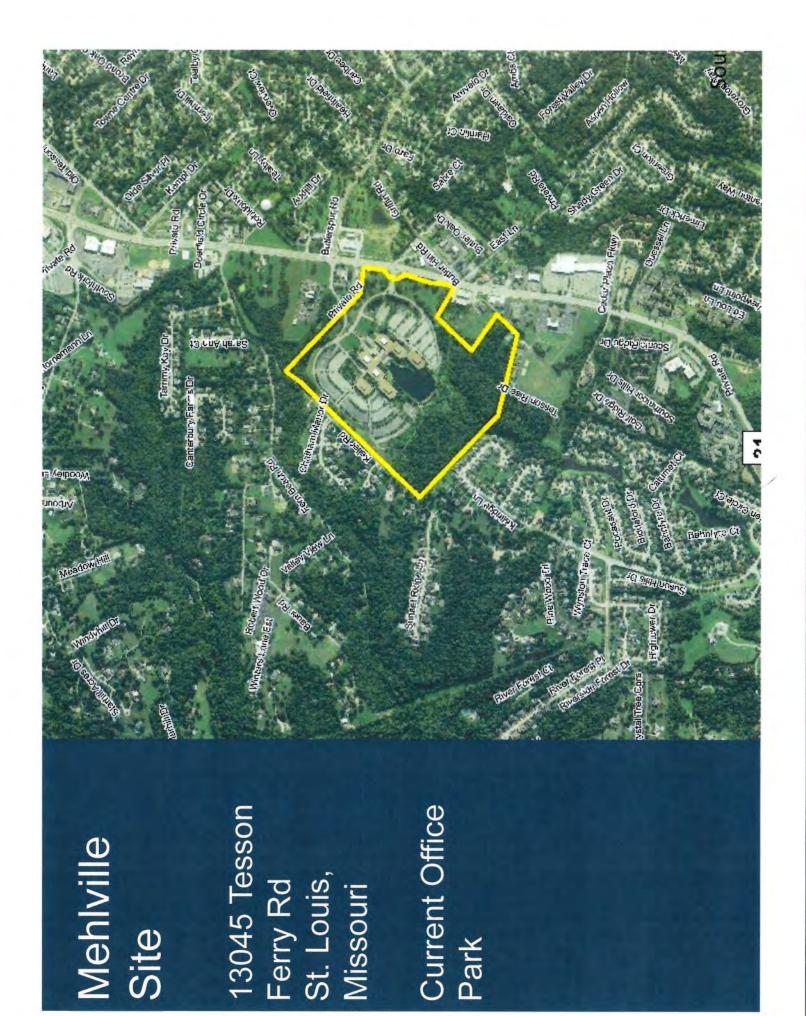
Analysis Branch



Fenton Site

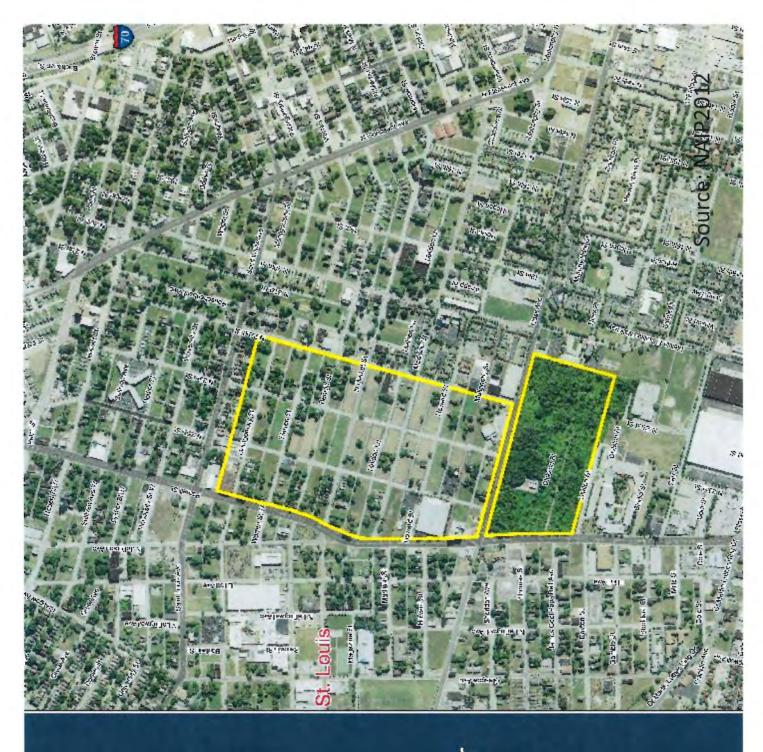
1050 Dodge Dr Fenton, Missouri Former Chrysler Plant





North St. Louis City Site

Intersection of Cass and Jefferson Avenues Includes former Pruitt-Igoe site



St. Clair County Site Located near O'Fallon, Illinois Adjacent to Scott Air Force Base near I-64



SAME LETTER SENT:

TRIBAL CHAIRPERSONS

Governor Edwina Butler-Wolfe Absentee-Shawnee Tribe 2025 S. Gordon Cooper Drive Shawnee, Oklahoma 74810-9381

Chief Glenna J. Wallace Eastern Shawnee Tribe of Oklahoma P.O. Box 350 Seneca, Missouri 64865

Chairman Ron Sparkman Shawnee Tribe P.O. Box 189 Miami, Oklahoma 74355

Principal Chief Bill John Baker Cherokee Nation P.O. Box 948 Tahlequah, Oklahoma 74465

Chief George Wickliffe United Keetoowah Band of Cherokee of Oklahoma P.O. Box 746 Tahlequah, Oklahoma 74464

President Kerry Holton Delaware Nation of Oklahoma P.O. Box 825 Anadarko, Oklahoma 73005

Chief Paula Pechonick Delaware Tribe of Indians 170 N. Barbara Bartlesville, Oklahoma 74006

Chairman John Barrett Citizen Potawatomi Nation 1601 S. Gordon Cooper Drive Shawnee, Oklahoma 74801

Chairman Harold Frank Forest County Potawatomi P.O. Box 340 Crandon, Wisconsin 54520 Chairman D.K. Sprague Match-e-be-nash-she-wish Band of Potawatomi Indians of Michigan P.O. Box 218 Dorr, Michigan 49323

Chairman Kenneth Meshigand Hannahville Indian Community of Michigan N14911 Hannahville Blvd. Rd. Wilson, Michigan 49896-9728

Chairman Homer Mandoka Nottawaseppi Huron Band of Potawatomi of Michigan 2221—1 ½ Mile Road Fulton, Michigan 49052

Chairman John P. Warren Pokagon Band of Potawatomi Indians, Michigan and Indiana P.O. Box 180 Dowagiac, Michigan 49047

Chairwoman Liana Onnen Prairie Band Potawatomi Nation Government Center 16281 Q Road Mayetta, Kansas 66509

President Jon Greendeer Ho-Chunk Nation of Wisconsin P.O. Box 667 Black River Falls, Wisconsin 54675

Chairman John Blackhawk Winnebago Tribe of Nebraska P.O. Box 687 Winnebago, Nebraska 68071

Chairman Tim Rhodd Iowa Tribe of Kansas and Nebraska 3345 Thrasher Road # 8 White Cloud, Kansas 66094

Chairman Gary Pratt Iowa Tribe of Oklahoma Route 1, Box 721 Perkins, Oklahoma 74059 Chairman Juan Garza Kickapoo Traditional Tribe of Texas HC 1, Box 9700 Eagle Pass, Texas 78853

Chairman Tony Salazar Kickapoo Tribe of Oklahoma P.O. Box 70 McCloud, Oklahoma 74851

Chairman Lester Randall Kickapoo Tribe of Indians of Kansas P.O. Box 271 Horton, Kansas 66439

Mr. George Thurman, Principal Chief Sac & Fox Nation of Oklahoma 920883 S. Hwy. 99 Building A Stroud, Oklahoma 74079

Chairman Michael Dougherty Sac & Fox Nation of Missouri 305 N. Main Street Hiawatha, Kansas 66434

Chairwoman Judith Bender Sac & Fox Tribe of Mississippi in Iowa 349 Meskwaki Road Tama, Iowa 52339

Chief Douglas Lankford Miami Tribe of Oklahoma P.O. Box 1326 202 S. Eight Tribes Trail Miami, Oklahoma 74355

Principal Chief Geoffrey Standing Bear The Osage Nation P.O. Box 779 Pawhuska, Oklahoma 74056

Chief John Froman Peoria Tribe of Indians of Oklahoma P.O. Box 1527 118 S. Eight Tribes Trail Miami, Oklahoma 74355

Chairman John Berrey Quapaw Tribe of Indians P.O. Box 765 Quapaw, Oklahoma 74363

SAME LETTER SENT:

TRIBAL REPRESENTATIVE:

Mr. Joseph Blanchard Tribal Historic Preservation Officer Absentee-Shawnee Tribe of Indians of Oklahoma 2025 Gordon Cooper Drive Shawnee, Oklahoma 74810-9381

Ms. Robin DuShane Eastern Shawnee Tribe of Oklahoma P.O. Box 350 Seneca, Missouri 64856

Ms. Kim Jumper Shawnee Tribe P.O. Box 189 Miami, Oklahoma 74355

Dr. Richard Allen Cherokee Nation P.O. Box 948 Tahlequah, Oklahoma 74465

Ms. Lisa Larue-Baker Tribal Historic Preservation Officer United Keetoowah Band of Cherokee Indians of Oklahoma P.O. Box 746 Tahlequah, Oklahoma 74464

Ms. Tamara Francis-Fourkiller Delaware Nation, Oklahoma P.O. Box 825 Anadarko, Oklahoma 73005

Dr. Bryce Obermeyer Tribal Historic Preservation Officer Delaware Tribe of Indians Roosevelt Hall, Room 212 1200 Commercial Street Emporia, Kansas 66801

Ms. Kelli Mosteller Tribal Historic Preservation Officer Citizen Potawatomi Nation Cultural Heritage Center 1601 S. Gordon Cooper Dr. Shawnee, Oklahoma 74801 Ms. Melissa Cook
Tribal Historic Preservation Officer
Forest County Potawatomi,
Community, Wisconsin
Cultural Center, Library & Museum
8130 Mishkoswen Drive, P.O. Box 340
Crandon, Wisconsin 54520

Mr. Todd Williamson Match-e-be-nash-she-wish Band of Pottawatomi Indians of Michigan P.O. Box 218 Dorr, Michigan 49323

Mr. Earl Meshigaud Hannahville Indian Community P.O. Box 351, HY 2 & 41 Harris, Michigan 49845

Mr. John Rodwan Nottawaseppi Huron Band of Potawatomi, Michigan 2221-1&1/2 Mile Road Fulton, Michigan 49052

Mr. Mike Zimmerman
Tribal Historic Preservation Officer
Pokagon Band of Potawatomi Indians,
Michigan and Indiana
P.O. Box 180
58620 Stink Road
Dowagiac, Michigan 49047

Ms. Jancita Warrington Prairie Band Potawatomi Nation Government Center 16281 Q Road Mayetta, Kansas 66509

Mr. William Quackenbush
Tribal Historic Preservation Officer
Ho-Chunk Nation of Wisconsin
P.O. Box 667
Black River Falls, Wisconsin 54615

Ms. Emily DeLeon Winnebago Tribe of Nebraska Little Priest Tribal College P.O. Box 270 Winnebago, Nebraska 68071

Mr. F. Martin Fee Tribal Historic Preservation Officer Iowa Tribe of Kansas and Nebraska 3345 Thrasher Road White Cloud, Kansas 66094

Mr. Kent Collier Kickapoo Tribe of Oklahoma P.O. Box 70 McCloud, Oklahoma 74851

Mr. Curtis Simon Kickapoo Tribe of Indians of Kansas 1107 Goldfinch Road Horton, Kansas 66439

Ms. Sandra Massey
Sac & Fox Nation of Oklahoma
920883 S. Hwy. 99
Building A
Stroud, Oklahoma 74079

Mr. Gary Bahr Sac & Fox Nation of Missouri 305 North Main Street Hiawatha, Kansas 66434 Mr. Jonathan Buffalo Sac & Fox Tribe of the Mississippi 349 Meskwaki Road Tama, Iowa 52339

Mr. George Strack Tribal Historic Preservation Officer Miami Tribe P.O. Box 1326 202 S. Eight Tribes Trail Miami, Oklahoma 74355

Dr. Andrea Hunter Historic Preservation Office The Osage Nation 627 Grandview Pawhuska, Oklahoma 74056

Ms. Cynthia Stacy Peoria Tribe 118 S. Eight Tribes Trail P.O. Box 1527 Miami, Oklahoma 74355

Mr. Everett Brandy Tribal Historic Preservation Officer Quapaw Tribe of Oklahoma P.O. Box 765 Quapaw, Oklahoma 74363



PEORIA TRIBE OF INDIANS OF OKLAHOMA

118 S. Eight Tribes Trail (918) 540-2535 FAX (918) 540-2538 P.O. Box 1527 MIAMI, OKLAHOMA 74355

CHIEF John P. Froman

SECOND CHIEF Jason Dollarhide

January 7, 2015

Department of the Army
St. Louis District Corps of Engineers
Attn: Roberta Hayworth
St. Louis District Tribal Liaison
1222 Spruce Street
St. Louis, MO 63103-2833

RE: New National Geospatial-Intelligence Agency campus location

Dear Ms. Hayworth,

Thank you for notice of the referenced project. The Peoria Tribe of Indians of Oklahoma is interested in consulting on the project. Please include us on all mailing and/or emailing lists pertaining to this project.

Contact information is:

Cynthia Stacy
Special Projects/NAGPRA Manager
118 S. Eight Tribes Trail
Miami, OK 74354
918-540-2535
cstacy@peoriatribe.com

Thank you,

John P. Froman

Chief



NAGPRA ext. 1403 Section 106 ext. 1181 Museum ext. 1181 Library ext. 1196 Clerk ext. 1182

January 9, 2015

RE: NGA Campus that will be constructed in the St. Louis Region

Ms. Hayworth,

The Delaware Nation Cultural Preservation Department received correspondence regarding the above referenced project. Our office is committed to protecting sites important to tribal heritage, culture and religion. Furthermore, the tribe is particularly concerned with archaeological sites that may contain human burials or remains, and associated funerary objects.

As described in your correspondence and upon research of our database(s) and files, we find that the Lenape people occupied this area either prehistorically or historically. However, the location of the project does not endanger cultural or religious sites of interest to the Delaware Nation. Please continue with the project as planned. However, should this project inadvertently uncover an archaeological site or object(s), we request that you halt all construction and ground disturbance activities and immediately contact the appropriate state agencies, as well as our office (within 24 hours).

Please Note the Delaware Nation, the Delaware Tribe of Indians, and the Stockbridge Munsee Band of Mohican Indians are the only Federally Recognized Delaware/Lenape entities in the United States and consultation must be made only with designated staff of these three tribes. We appreciate your cooperation in contacting the Delaware Nation Cultural Preservation Office to conduct proper Section 106 consultation. Should you have any questions regarding this email or future consultation feel free to contact our offices at 405-247-2448 or by email nalligood@delawarenation.com.

Sincerely,

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Nekole Alligood

Director

Kickapoo Tribe of Oklahoma

P.O.Box 70 407 N. Hwy 102 McLoud, Oklahoma 74851 Administration Department Phone: 405-964-7053; Fax: 405-964-7065 Email: kwilson@kickapootribeofoklahoma.com

January 15, 2015

Department of the Army U.S. Army Corps of Engineers St. Louis District ATTN: Ms. Roberta L. Hayworth 1222 Spruce Street St. Louis, MO 63103-2833

RE: New National Geospatial-Intelligence Agency (NGA) Campus, Fenton, Mehlville, North St. Louis City or St. Clair County, Illinois

Dear Ms. Hayworth:

Thank you for consulting with the Kickapoo Tribe of Oklahoma in regard to the above referenced site(s). At this time, the Kickapoo Tribe of Oklahoma has no objections to the proposed project at the intended site(s). However, in the event burial remains and/or artifacts are discovered during the development or construction process, the Kickapoo Tribe of Oklahoma would ask for immediate notification of such findings.

Should I be of any further assistance, please contact me at (405) 964-4227.

Sincerely,

Kent Collier

NAGPRA Contact

Kickapoo Tribe of Oklahoma

Cc: File

From: Lisa LaRue-Baker - UKB THPO [ukbthpo-larue@yahoo.com]

Sent: Wednesday, January 21, 2015 3:34 PM

To: Hayworth, Roberta L MVS

Cc: Elizabeth Bird; Ernestine Berry

Subject:[EXTERNAL] National Geospatial Intelligence Agency campus, St Louis MO

Hi Roberta,

The United Keetoowah Band of Cherokee Indians in Oklahoma have reviewed your project under Section 106 of the NHPA, and at this time, have no comments or objections. However, if any human remains are inadvertently discovered, please cease all work and contact us as soon as possible. The UKB reserves the right to re enter consultation at any time regarding this project.

Thanks so much!

Lisa C. Baker

Acting THPO

United Keetoowah Band of Cherokee Indians in Oklahoma

PO Box 746

Tahlequah, OK 74465

c 918.822.1952

ukbthpo-larue@yahoo.com

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Please FOLLOW our historic preservation page and LIKE us on FACEBOOK

<a href="https://www.facebook.com/pages/United-Keetoowah-Band-of-Cherokee-Indians-in-c

Oklahoma-Historic-Preservation/199767846834850>

From: John Fox [jfox@osagenation-nsn.gov]
Sent: Thursday, January 22, 2015 1:18 PM

To: Hayworth, Roberta L MVS

Cc: Andrea Hunter

Subject: [EXTERNAL] National Geospatial-Intelligence Agency Campus

Dear Ms. Hayworth,

The Osage Nation Historic Preservation Office has received a notification regarding the new National Geospatial-Intelligence Agency campus in the St. Louis region. All four of the proposed locations are highly sensitive areas for the Osage Nation, and we would like to participate in tribal consultation with you on this project. We would request cultural resource surveys for any of these locations. The North St. Louis City Site is near the Osage Mississippi River Trail, and is likely the most sensitive location for the Osage Nation. Additionally, this location incorporates the former Pruitt-Igoe site. This is not a direct concern for the Osage Nation, but it is likely an important recent historical archaeological site, especially for the African American community in the St. Louis area.

Thank you for consulting with the Osage Nation,

John Fox

Archaeologist I
Osage Nation Historic Preservation Office
627 Grandview
Pawhuska, OK 74056
(918)287-5274
jfox@osagenation-nsn.gov



April 22, 2015

Colonel Kyle J. Kremer Commander, 375th AMW 101 Heritage Drive, Suite 375 Scott AFB, IL 62225-5001

Mr. Thomas J. Bukoski, AICP Director Facility Program Office Security and Installations Directorate National Geospatial-Intelligence Agency Mail Stop S81-SIF 7500 GEOINT Drive Springfield, VA 22150-7500

Ref: Proposed Vacation of the St. Louis Arsenal and the Identification, Construction, and Operation of a New Facility for the National Geospatial-Intelligence Agency St. Louis, Missouri

Dear Col Kremer and Mr. Bukoski:

On March 19, 2015, the Advisory Council on Historic Preservation (ACHP) participated in a teleconference with the staff from the Air Force Civil Engineer Center, Midwest (AFCEC-Midwest), 375th Air Mobility Wing (AMW), and the Missouri State Historic Preservation Office (MOSHPO) to discuss the referenced undertaking and how the National Geospatial-Intelligence Agency (NGA) is meeting its responsibilities under the regulations implementing Section 106 of the National Historic Preservation Act, "Protection of Historic Properties" (36 CFR Part 800). Based on that conversation the ACHP requests further information on how 375AMW and NGA will meet the purpose and intent of the Section 106 process.

We understand that the United States Army Corps of Engineers, Kansas City District, (USACE), acting on behalf of the NGA, met with the MOSHPO in February 2015 to discuss proposed actions to identify and operate a new site location for NGA in Missouri and further, discussed the potential impacts to historic properties. NGA has stated that its current facility, South 2nd Street known as the St. Louis Arsenal, is functionally obsolete and requires modernization. Through a series of planning studies NGA has determined it would be less costly and quicker to build a new campus than to rehabilitate its current facilities. In addition, we understand that NGA is treating the decision to move to a new facility and the disposal of the current facility as a severable action between the National Historic Preservation Act (NHPA) and the National Environmental Policy Act (NEPA) for the following reasons:

 As the real property owners for NGA, the 375AMW will ultimately be the lead agency for the disposition of the site, while USACE is the lead agency for the identification and relocation to a new site.

- The disposition process is not a reasonably foreseeable action at this time because the future use/ownership of the site is currently unknown and on a distinctly different and unrelated timeline.
- The process of vacating the site may take many years due to the removal of classified systems at the current site and the logistics involved in developing agreements with the 375ABW for the management of the disposition. These agreements with the 375ABW will need to be in place prior to any Section 106 agreements regarding the St. Louis Arsenal.

Section 106 of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties in order to accommodate historic preservation concerns with the needs of federal undertakings commencing at the early stages of project planning. The goal of consultation is to identify historic properties potentially affected by the undertaking, assess its effects and seek ways to avoid, minimize or mitigate any adverse effects on historic properties. The agency official must complete the Section 106 process "prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license." This does not prohibit an agency official from conducting or authorizing nondestructive project planning activities before completing compliance with Section 106, provided that such actions do not restrict the subsequent consideration of alternatives to avoid, minimize or mitigate the undertaking's adverse effects on historic properties. The agency official shall ensure that the Section 106 process is initiated early in the undertaking's planning, so that a broad range of alternatives may be considered during the planning process for the undertaking.

While the regulations clearly assign responsibility for identifying and defining undertakings to the federal agency, the ACHP is concerned that the rationale used for these decisions by the 375ABW and NGA is misguided. In accordance with 36 CFR § 800.9(a) the ACHP requests a response from the 375ABW and NGA with additional information to address the following:

- The rational NGA is using to consider the vacation and reuse of its current facility as a separate undertaking from the construction of a new facility under Section 106.
- Any summary of the discussion between the 375ABW and NGA regarding NGA vacating the St. Louis Arsenal, including discussions on updating the current facility as an alternative to construction of a new facility.
- Defining the undertaking(s) currently being considered by both the 375ABW and NGA.

If you have any questions, please contact Ms. Katharine R. Kerr at (202) 517-0216, or via e-mail at kkerr@achp.gov.

Sincerely,

Caroline D. Hall Assistant Director

Federal Property Management Section Office of Federal Agency Programs



DEPARTMENT OF THE ARMY CORPS OF ENGINEERS, KANSAS CITY DISTRICT 635 FEDERAL BUILDING 601 E 12TH STREET KANSAS CITY MO 64106-2824

Director Toni Prawl State Historic Preservation Officer Missouri Department of Natural Resources P.O. Box 176 Jefferson City, MO 65102

June 15, 2015

RE: Section 106 Consultation for National Geospatial Intelligence Agency Action

Dear Director Prawl,

In compliance with Section 106 of the National Historic Preservation Act, the U.S. Army Corps of Engineers, Kansas City District (USACE), initiated informal consultation with your office at the agency scoping meeting for the Environmental Impact Statement for National Geospatial Intelligence Agency (NGA) Action in St. Louis, Missouri, on December 10, 2014. With this correspondence, USACE is formally initiating Section 106 consultation on the proposed relocation of the NGA, currently located in St. Louis, Missouri. The undertaking is defined as the construction and operation of a new NGA facility capable of meeting current and future mission requirements.

Background data collection, literature review, and preliminary site visits for all four alternative locations were completed by Brockington and Associates, the project cultural resource consultants. The technical memoranda for the three Missouri alternative locations – North St. Louis City, Fenton, and Mehlville - presented the results of the background research and preliminary field work is enclosed for your review and comment. Field work at these locations consisted of archaeological pedestrian surveys and an examination of the built environment. No shovel testing or other subsurface survey was undertaken. No archaeological sites have been identified at any of the alternative locations.

Determinations of Eligibility

North St. Louis City

At the North St. Louis City location, we request your concurrence that twelve (12) architectural resources are not eligible for the National Register of Historic Place (NRHP) and that two (2) architectural resources are eligible for the NRHP, shown in the table below. Additional information on identification of the properties follows the table.

Resource Name	Address	Date of Construction	NRHP Determination
Resource A - Grace Hill Family Health Center (former US Post Office Annex)	2201 Maiden Lane	1968 george de la constantia	Not Eligible
Resource B - Commercial Building (former Model Cities Office)	2409 Cass Avenue	1956	Not Eligible
Resource C – Grace Baptist Church	2319 Cass Avenue	1956	Not Eligible
Resource D - Commercial Building	2301 Cass Avenue	c. 1955	Not Eligible
Resource E - Warehouse	2525 Howard Street	1956	Not Eligible
Resource F - Flounder House	2318 Madison Avenue	1892	Not Eligible
Pruitt-Igoe Electrical Substation	Former Pruitt-Igoe Site	1956	Not Eligible
Church of the Living God (former Crunden Branch Library)	2008 Cass Avenue	1959	Eligible
City of St. Louis Fire Department Headquarters (former Jefferson-Cass Health Center)	1421 North Jefferson Avenue	c. 1968	Eligible
West St. Louis Place neighborhood (Resource 1)	Bounded to the north by St. Louis Avenue, to the south by Cass Avenue, to the east by N. 22nd Street, and to the West by North Jefferson Avenue and Parnell Place	Late Nineteenth Century to Early Twentieth Century	Not Eligible
Resource 2 - Second Empire style townhouse	2236 Warren Street	1893	Not Eligible
Resource 3 - Second Empire style townhouse	2251 Warren Street	1890 www.mollesso	Not Eligible
Resource 4 - Classical Revival style commercial building (former Homeopathic College of Missouri)	1620 North Jefferson Avenue	c. 1900	Not Eligible

Resource 5 -	2530 North Market	1905	Not Eligible
Richardsonian	Street	provide account of	n commence of accordance streeping or
Romanesque style	and or all this system and A and	DOMESTIC AND ADDRESS.	The set million better his day
townhouse	all all supply that the last	NUMBER OF STREET	standard of the base and to the same

A total of nine architectural resources were previously identified in the Area of Potential Effect (APE) but did not have formal determinations of eligibility: five resources within the project tract (Resources A-E in the table) were previously identified during the Modern Movement Survey conducted by the City of St. Louis Cultural Resources Office (CRO); one resource (Resource F in the table) was identified by the St. Louis CRO in the Thematic Survey of Flounder Houses in St. Louis City; one resource, the Pruitt-Igoe electrical substation, was identified as part of previous studies of the former Pruitt-Igoe housing complex; and two resources immediately adjacent to the project tract were recorded during the Modern Movement Survey; the former Crunden Branch Library and the former Jefferson-Cass Health Center.

Five additional architectural resources were identified as a result of the field survey for this project: the West St. Louis Place neighborhood (Resource 1), two Second Empire-style townhouses (Resources 2 and 3), one commercial building (Resource 4), and one Richardsonian Romanesque-style townhouse (Resource 5).

The North St. Louis City Alternative retains a high likelihood for hosting archaeological sites, with historic sites as the most likely, represented by features such as cisterns, privies, and wells. Prehistoric features and diagnostic lithics are not likely in the project area. Effects to potential significant archaeological sites would be addressed in the proposed Programmatic Agreement, discussed below.

Fenton

No architectural resources remain on the site that are predate 1966. Therefore, no determinations of eligibility were necessary and there were no historic architectural resources identified within the APE.

The Fenton Alternative is located along the Meramec River floodplain, and deep alluvial deposits that can bury and protect archaeological sites are expected there. Because of this, the floodplain and terrace context of the property has moderate to high potential for deeply buried sites depending on the depth of previous disturbance. As discussed at the consultation meeting held on December 10, 2014, the U.S. Army Corps of Engineers is planning geo-archaeological work at this location to evaluate the potential presence of deeply buried cultural deposits and the limits of disturbed soils. Once this work is completed, a technical memorandum will be completed that includes a description of the work, the findings, and a recommended path forward. The technical memorandum will follow the Missouri State Historic Preservation Office requirements and will be submitted to your office for review and comment.

Mehlville

The property contains a commercial campus from 1978. There were no historic architectural resources identified within the APE. As the Mehlville Alternative falls in the dissected uplands above and to the east of the Meramec River, substantial alluvial deposits are not expected. Accordingly, no deep testing is planned.

Finding of Effect was someway by the finding to anomalize the same as well on belond 130 A.

tract (Resources A-E in the table) were previously identified during the Medem Meyens Because the alternative for the undertaking has yet to be selected, the undertaking has the potential to cause an adverse effect on historic properties, including those located at the North St. Louis location. The U.S. Army Corps of Engineers has elected to pursue a Programmatic Agreement per 36 CFR 800.14(b)(1)(ii) to resolve the potential adverse effects to historic properties under all alternatives being considered. We are currently planning a consultation meeting to discuss the Programmatic Agreement and will contact you shortly regarding dates and your availability. Ms. Lori Price with CH2M Hill will be coordinating the development the programmatic agreement for the effort.

We appreciate your time and look forward to continuing to consult with you on this important project. Please contact Mr. Richard Skinker, U.S. Army Corps of Engineers, Kansas City District, by telephone at (816) 389-3134 or myself at (816) 389-3841, or by email at NextNGAWest@usace.army.mil. with historic sites as the most idealy, represented by features such as cisterus, privide, and walls

Perhande features and diagnostic lithics a quot illusty in the project area, Effects to potential

Enclosures

Laurie Farmer Project Manager No architectural resources remain on the site that are recentle 1966. Therefore, no determinations

cc: Judith Deel, Missouri State Historic Preservation Office Erwin Roemer, AFCEC/CZO-Midwest Thomas Reynolds, National Geospatial-Intelligence Agency Lori Price, CH2M Hill



DEPARTMENT OF THE ARMY

CORPS OF ENGINEERS, KANSAS CITY DISTRICT
635 FEDERAL BUILDING
601 E 12TH STREET
KANSAS CITY MO 64106-2824

Ms. Amy Martin State Historic Preservation Officer Illinois Historic Preservation Agency 1 Old State Capitol Plaza Springfield IL 62701-1507

June 15, 2015

RE: Section 106 Consultation for National Geospatial Intelligence Agency Action

Dear Ms. Martin,

In compliance with Section 106 of the National Historic Preservation Act, the U.S. Army Corps of Engineers, Kansas City District (USACE), initiated informal consultation with your office at the agency scoping meeting for the Environmental Impact Statement for National Geospatial Intelligence Agency (NGA) Action in St. Clair County, Illinois, on December 10, 2014. With this correspondence, U.S. Army Corps of Engineers, Kansas City District, is formally initiating Section 106 consultation on the proposed relocation of the NGA, currently located in St. Louis, Missouri. The undertaking is defined as the construction and operation of a new NGA facility capable of meeting current and future mission requirements.

Background data collection, literature review, and preliminary site visits for all four alternative locations were completed by Brockington and Associates, the project cultural resource consultants. The technical memoranda for the St. Clair County, Illinois site presenting the results of the background research and preliminary field work are enclosed for your review and comment. Field work at this site consisted of an examination of the built environment. No shovel testing or other subsurface survey was undertaken. One archaeological site in the project footprint, Site 11S825, was previously determined eligible for the National Register of Historic Places (NRHP). Two other sites - 11S934 and 11S935 – are not considered eligible and we request your concurrence with the finding that no further management consideration is needed for these two sites. One building, Facility 295, an Integrated Logistics Support Marker Beacon Facility (ILS), was identified within the project tract, and the Cardinal Creek Golf Course was identified within the Area of Potential Effects. We request your concurrence with our determination that neither of these two properties is eligible for the NRHP.

Because the alternative for the undertaking has yet to be selected, the undertaking has the potential to cause an adverse effect on historic properties, including Site 11S825. Due to the size and location of the archaeological site, it may not be possible to avoid impacts to the site if the St. Clair County alternative is selected as the Preferred Alternative. USACE has elected to pursue a Programmatic Agreement per 36 CFR 800.14(b)(1)(ii) to resolve the potential adverse

effects to historic properties under all alternatives being considered. We are currently planning a consultation meeting to discuss the Programmatic Agreement and will contact you shortly regarding dates and your availability. Ms. Lori Price with CH2M Hill will be coordinating the development the programmatic agreement for the effort.

We appreciate your time and look forward to continuing to consult with you on this important project. Please contact Mr. Richard Skinker, U.S. Army Corps of Engineers, Kansas City District, by telephone at (816) 389-3134 or myself at (816) 389-3841, or by email at NextNGAWest@usace.army.mil.

Enclosures

Laurie Farmer

NEPA Project Manager

cc: Joseph Phillippe, Illinois State Historic Preservation Office
Thomas Reynolds, National Geospatial Intelligence Agency
Erwin Roemer, AFCEC/CZO-Midwest
Lori Price, CH2M Hill



DEPARTMENT OF THE ARMY CORPS OF ENGINEERS, KANSAS CITY DISTRICT 635 FEDERAL BUILDING 601 E 12TH STREET KANSAS CITY MO 64106-2824

Ms. Katharine Kerr Program Analyst Advisory Council on Historic Preservation Old Post Office Building 1100 Pennsylvania Avenue, NW, Suite 803 Washington, DC 20004

June 19, 2015

RE: Advisory Council Invitation Letter for National Geospatial Intelligence Agency Programmatic Agreement

Dear Ms. Kerr:

Under Section 106 of the National Historic Preservation Act (NHPA), as codified in Title 36, Code of Federal Regulations Part 800 (36 CFR 800), the United States Army Corps of Engineers, Kansas City District (USACE-NWK), as lead federal agency, is initiating consultation on a project-specific Programmatic Agreement (PA). This PA is intended to resolve potential adverse effects at multiple sites from relocation of the National Geospatial-Intelligence Agency (NGA) to a new campus (Next NGA West) in the greater St. Louis, Missouri, metropolitan area. The development of this new NGA campus meets the definition of an undertaking in 36 CFR 800.16(y). USACE-NWK, in conjunction with NGA and the U.S. Air Force (USAF), has determined that a PA to be developed in consultation with the Missouri and Illinois State Historic Preservation Officers (SHPOs), the City of St. Louis, Native American tribes, and other interested parties, is appropriate under 36 CFR 800.14(b)(1)(ii) because the effect on historic properties at these locations cannot be fully determined prior to the approval of the undertaking. Because the alternative for the undertaking has yet to be selected, the standard Section 106 process described in 36 CFR 800.4-800.6 cannot be completed prior to a final National Environmental Policy Act (NEPA) Environmental Impact Statement Record of Decision. The USACE-NWK, NGA, and USAF have elected to pursue a PA to resolve the potential adverse effects to historic properties under all alternatives being considered. In accordance with 36 CFR 800.6(a)(1)(i)(C), this letter is our invitation to the Advisory Council on Historic Preservation to participate in the consultation.

NGA is the proponent of this undertaking and USACE-NWK is responsible for the environmental analysis of the undertaking, including compliance with NEPA and Section 106 of the NHPA. The USAF is participating because it will be the ultimate property owner of the new NGA facility. The PA will address potential adverse effects at four possible alternative development locations, of which three are in Missouri and one is in Illinois. Please see the

attached maps for possible project locations and their respective areas of potential effects (APEs).

- Fenton: 1050 Dodge Drive, Fenton, Missouri (southwest of St. Louis)
- Mehlville: 13045 Tesson Ferry Road, St. Louis, Missouri (south of downtown St. Louis)
- St. Louis City: near the intersections of Cass and North Jefferson Avenues in downtown St. Louis
- St. Clair County: along Interstate 64, adjacent to Scott Air Force Base, Illinois (east of St. Louis)

Please note that this PA does not intend to resolve effects from the decommissioning of the existing NGA facility at the St. Louis Arsenal, located at 3200 South 2nd Street and Arsenal Street in St. Louis, Missouri. That matter will be addressed in separate correspondence in response to your letter dated April 22, 2015 and will be jointly sent under separate cover from NGA and USAF.

Anticipated signatories to the Section 106 PA are USACE-NWK, NGA, USAF, City of St. Louis, Missouri SHPO, and Illinois SHPO, as well as the Advisory Council on Historic Preservation should your office wish to participate. An initial Section 106 consultation meeting to discuss the draft PA is scheduled for July 8, 2015; at that time, discussions about the goals and intentions of the PA will occur. A framework draft of the PA, to be built upon during consultation, will be mailed electronically prior to the scheduled date of the meeting.

Identified Historic Properties

Fenton: There are no historic properties and no previously identified archaeological sites within the Fenton APE. However, due to the location of the property along the Meramec River floodplain where deep alluvial deposits can bury and protect archaeological sites, the floodplain and terrace context of the property has potential for deeply buried sites depending on the depth of previous disturbance. Future geo-archaeological surveys are planned for this area to identify the depth of previous disturbance and investigate the probability for deeply buried sites.

Mehlville: There are no historic properties and no previously identified archaeological sites within the Mehlville APE.

St. Louis City: The APE for the St. Louis City location contains three buildings that are individually listed in the NRHP, a section of a NRHP-listed historic district with 105 contributing buildings and 16 contributing objects, and three buildings eligible for listing in the NRHP (two of which are pending SHPO concurrence). The table below lists the historic properties in the APE. There are no previously recorded archaeological sites located within the

APE for the St. Louis City location, but it retains a high likelihood for hosting historic period archaeological sites.

Architectural Historic Properties within the APE for the St. Louis City Location

Name (Date)	Address	Description	NRHP Status
St. Louis Place NRHP District (1870-1930)	Roughly bounded by 21st, 22nd, 23rd, and 25th Streets. Benton Street, Montgomery Street, N. Market Street, Rauschenbach Avenue, and St. Louis Avenue	Late nineteenth-century to early twentieth-century residential urban historic district northwest of downtown St. Louis, Missouri: 105 contributing buildings and 16 contributing objects are located within the APE	NRHP Listed in 2011
Buster Brown-Blue Ribbon Shoe Factory (1901)	1526 N. Jefferson Ave.	Four-story red brick masonry building	NRHP Listed in 2005
St. Stanislaus Kostka Church (1892)	1413 N. 20th St.	Polish Romanesque church	NRHP Listed in 1979
Frank P. Blair School (1882-1894; 1891)	2707 Rauschenbach Ave,	Three-story brick masonry school	NRHP Listed in 1983; also located in the St. Louis Place NRHP District
Former Pruitt School (1956)	1212 N. 22nd St.	School for the former Pruitt-Igoe Housing Complex	Determined NRHP eligible by SHPO in 2013
Former Crunden Branch Library (1959)	2008 Cass Ave.	Library for the former Pruitt-Igoe Housing Complex; now serves as a church	NRHP eligible
Former Jefferson-Cass Health Center (1968)	1421 N. Jefferson Ave.	Health Center for the Pruitt-Igoe Housing Complex: now serves as the Fire Station Headquarters	NRHP eligible

Pending SHPO concurrence.

St. Clair County: There are no historic built environment properties within the St. Clair County location but the property does contain archaeological sites. Previously identified archaeological Site 11S825 is eligible for listing in the NRHP. USACE-NWK determined Sites 11S934 and 11S935 not eligible for the NRHP (pending SHPO concurrence). Site 11S825, also referred to as the Hancock Site, is a prehistoric lithic scatter that also includes evidence from late-eighteenth to early-twentieth century occupations. Limited archaeological testing of the site occurred in 2012 as part of a Phase II investigation and as a result, historic period artifacts associated with the Pioneer (circa 1781-1840), Frontier (circa 1841-1870) and Early Industrial (circa 1871-1900) periods in addition to a prehistoric component were identified. These results showed that the site

had potential to yield significant information about mid-nineteenth century settlement and landscape utilization in St. Clair County.

Project Effects

Potential adverse effects have been identified for at least three of the potential locations – Fenton, St. Louis City, and St. Clair County.

Fenton: At the Fenton location, there is a potential adverse effect due to the potential for deeply buried cultural deposits. If previously undiscovered deeply buried deposits were found to be present, there is the potential that they would be adversely affected by construction activities for the proposed project.

St. Louis City: At the St. Louis City location, 18 historic properties located within the project boundary would be demolished including the NRHP-listed Buster Brown-Blue Ribbon building and contributing elements to the NRHP-listed St. Louis Place NRHP District. The demolition of NRHP-listed buildings or contributing resources to an NRHP-listed historic district would result in a finding of adverse effect. Other potential adverse effects could occur to historic properties that are adjacent to the project development from proximity effects such as visual impacts and changes in the character of the remaining historic district.

St. Clair County: Development of the St. Clair County location could impact archaeological Site 11S825, which is eligible for listing in the NRHP. Due to the size and location of the site, it is unlikely that it could be completely avoided during project construction. As a result of construction activities, disturbance to the site could result in an adverse effect.

Conclusion

Enclosed you will find the remaining documentation required under 36 CFR 800.6(a)(1) and 800.11(e) in the form of eight cultural resources technical reports - one for archaeology and one for built environment for each of the four alternative locations. These reports include a description of the undertaking and the areas of potential effects including maps and photos, the methodology used to identify historic properties to date, and descriptions of those properties. Please note that no comments have been received regarding cultural resources from the public or consulting parties at this time. Two Native American tribes have asked to participate in the consultation process – the Osage Nation and the Peoria Tribe – and their correspondence requesting to participate is attached.

We request that you respond to this invitation within 15 days of receipt, per 36 CFR 800.6(a)(1)(iii). If you have any questions or need additional information, please contact Mr. Richard Skinker, USACE-NWK, by telephone at (816) 389-3134 or myself at (816)389-3841, or by electronic mail at NextNGAWest@usace.army.mil.

Sincerely,

Laurie Farmer

NEPA Project Manager

Enclosures: APE maps (4) Tribal Correspondence (2) Cultural Resource Technical Reports (8)

cc: Judith Deel
Joseph Phillippe
Betsy Bradley
Erwin Roemer
Thomas Reynolds
Susan Malin-Boyce



DEPARTMENT OF THE ARMY

CORPS OF ENGINEERS, KANSAS CITY DISTRICT 635 FEDERAL BUILDING 601 E 12^{TH} STREET KANSAS CITY MO 64106-2824

Director Toni Prawl State Historic Preservation Officer Missouri Department of Natural Resources P.O. Box 176 Jefferson City, MO 65102

June 29, 2015

RE: Invitation to face-to-face consultation meeting for NGA

Dear Director Prawl,

In correspondence dated June 15, 2015, in compliance with Section 106 of the National Historic Preservation Act, the U.S. Army Corps of Engineers, Kansas City District (USACE), initiated consultation with your office on the proposed relocation of the National Geospatial-Intelligence Agency (NGA) facility, currently located in St. Louis, Missouri. The undertaking is defined as the construction and operation of a new NGA facility capable of meeting current and future mission requirements. Four alternative locations are being evaluated for the new facility.

As lead federal agency for Section 106, USACE has elected to pursue the development of a project-specific Programmatic Agreement (PA) as described in 36 CFR 800.14(b)(1)(ii). The effect on historic properties cannot be fully determined at this point because the Preferred Alternative has yet to be selected. Therefore, USACE, in conjunction with NGA and the U.S. Air Force (USAF), wishes to consult with the Missouri and Illinois State Historic Preservation Officers (SHPOs), and other interested parties to develop a PA to resolve the potential adverse effects to historic properties under all alternatives being considered.

USACE is holding a face-to-face consultation meeting on July 8, 2015 at 9 am. The meeting will be held at the USACE Engineering and Construction Conference Room of the Robert A Young Federal Building, located at 1222 Spruce Street, St. Louis, Missouri 63103. If you have any questions or need additional information, please contact Mr. Richard Skinker at (816) 389-3134, or myself at (816) 389-3841.

Sincerely,

Laurie Farmer

NEPA Project Manager

cc: Judith Deel, Missouri State Historic Preservation Office



DEPARTMENT OF THE ARMY

CORPS OF ENGINEERS, KANSAS CITY DISTRICT 635 FEDERAL BUILDING 601 E 12^{TH} STREET KANSAS CITY MO 64106-2824

Ms. Amy Martin State Historic Preservation Officer Illinois Historic Preservation Agency 1 Old State Capitol Plaza Springfield IL 62701-1507

June 29, 2015

RE: Invitation to face-to-face consultation meeting for NGA

Dear Ms. Martin,

In correspondence dated June 15, 2015, in compliance with Section 106 of the National Historic Preservation Act, the U.S. Army Corps of Engineers, Kansas City District (USACE), initiated consultation with your office on the proposed relocation of the National Geospatial-Intelligence Agency (NGA) facility, currently located in St. Louis, Missouri. The undertaking is defined as the construction and operation of a new NGA facility capable of meeting current and future mission requirements. Four alternative locations are being evaluated for the new facility.

As lead federal agency for Section 106, USACE has elected to pursue the development of a project-specific Programmatic Agreement (PA) as described in 36 CFR 800.14(b)(1)(ii). The effect on historic properties cannot be fully determined at this point because the Preferred Alternative has yet to be selected. Therefore, USACE, in conjunction with NGA and the U.S. Air Force (USAF), wishes to consult with the Missouri and Illinois State Historic Preservation Officers (SHPOs), and other interested parties to develop a PA to resolve the potential adverse effects to historic properties under all alternatives being considered.

USACE is holding a face-to-face consultation meeting on July 8, 2015 at 9 am. The meeting will be held at the USACE Engineering and Construction Conference Room of the Robert A Young Federal Building, located at 1222 Spruce Street, St. Louis, Missouri 63103. If you have any questions or need additional information, please contact Mr. Richard Skinker at (816) 389-3134, or myself at (816) 389-3841.

Singerely,

Laurie Farmer

NEPA Project Manager

cc: Joseph Phillippe, Illinois State Historic Preservation Office

Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

June 30, 2015

Laurie Farmer
Corps of Engineers, Kansas City District
635 Federal Building
601 E 12th St
Kansas City, MO 64106

Re:

SHPO Project Number: **038-SLC-14**, Section 106 review of NGA project Cultural Resource Reports, St. Louis City and St. Louis County, Missouri (NGA)

Dear Ms. Farmer:

Thank you for submitting additional information on the above referenced project for our review pursuant to Section 106 of the National Historic Preservation Act (P.O. 89-665, as amended and the Advisory Council on Historic Preservation's regulation 36 CFR Part 800, which require identification and evaluation of cultural resources.

We have reviewed the submitted reports and found that a complete review of SHPO records was not performed for the North St. Louis City Site. The report is missing architectural resources which have previously been determined potentially eligible for listing on the National Register. Please contact this office in order to schedule a records review, and submit an updated report which includes these resources and eligibility status. If the preparer has compelling evidence as to the buildings eligibility an argument of that nature should be included in the report.

Based on the preliminary information provided in the architectural survey of the North St. Louis Site we concur that The Church of the Living God (former Crunden Branch Library), City of St. Louis Fire Department Headquarters (Former Jefferson-Cass Health Center), and Pruitt School are eligible for the National Register. We also agree that resources A- F, The Pruitt-Igoe Electrical Substation, and Resources 1-5 are not eligible for the National Register. Please keep in mind that this is not the SHPO's final comment on eligibility, and that additional information has been requested.

After reviewing the architectural surveys for the Fenton and Mehlville sites, we concur with the findings in these two reports. In addition, we have reviewed the archaeological reports, for the three proposed locations, and concur with the recommendations therein.

If you have any questions please write Missouri Department of Natural Resources, State Historic Preservation Office, Attn: Review and Compliance, P.O. Box 176, Jefferson City, Missouri 65102, or call Amanda Burke (573) 522-4641. Please be sure to include the **SHPO Project Number (038-SLC-14)** on all future correspondence relating to this project. If the information is provided via telephone call, please follow up in writing for our files.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

Toni M. Prawl, PhD Director and Deputy

State Historic Preservation Officer

TMP:ab

C: Erwin Romer, USAF Mark McMoy, USAF Betsy Bradley, CRO Katharine Kerr, ACHP



Nolan-Wheatley, Marynell/NYC

From: Price, Lori/TPA

Sent: Wednesday, July 29, 2015 5:49 PM **To:** Nolan-Wheatley, Marynell/NYC

Subject: FW: NGA face to face meeting with SHPO's (UNCLASSIFIED)

Follow Up Flag: Follow up Flag Status: Flagged

----Original Message----

From: Farmer, Laurie M NWK [mailto:Laurie.M.Farmer@usace.army.mil]

Sent: Wednesday, July 01, 2015 10:43 AM

To: aweil@landmarks-stl.org; preservemo10@yahoo.com; tilliescorner@yahoo.com

Cc: Price, Lori/TPA; Zender, Kira/ATL; Skinker, Richard A NWK Subject: NGA face to face meeting with SHPO's (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

The U.S. Army Corps of Engineers, Kansas City District (USACE) has initiated consultation with the Missouri State Historic Preservation Office and the Illinois State Historic Preservation Office on the proposed relocation of the National Geospatial-Intelligence Agency (NGA) facility, currently located in St. Louis, Missouri. The undertaking is defined as the construction and operation of a new NGA facility capable of meeting current and future mission requirements. Four alternative site locations are being evaluated for the new facility. At this point, a preferred alternative has not been selected.

The four alternative site locations include the following:

- Fenton: 1050 Dodge Drive, Fenton, Missouri
- Mehlville: 13045 Tesson Ferry Road, St. Louis, Missouri
- North St. Louis City: near the intersections of Cass and North Jefferson Avenues, and
- St. Clair County: along Interstate (I-64), adjacent to the northeast boundary of Scott Air Force Base (AFB), Illinois (east of St. Louis)

USACE is holding a face-to-face consultation meeting on July 8, 2015 at 9 am to initiate the development of a Programmatic Agreement (PA) aimed at documenting the federal government's commitment to carry out and conclude our responsibilities under Section 106 of the National Historic Preservation Act. The PA will consider all four site locations. The meeting will be held at the USACE Engineering and Construction Conference Room of the Robert A Young Federal Building, located at 1222 Spruce Street, St. Louis, Missouri 63103. If you wish to participate, please contact me at (816) 389-3841 or by email. Space is limited.

Thank you,

Laurie Farmer USACE - Kansas City District 601 East 12th Street Kansas City, MO 64106 816-389-3841 (desk) 816-673-5598 (mobile)

Classification: UNCLASSIFIED

Caveats: NONE

1 Old State Capitol Plaza, Springfield, IL 62701-1512

FAX (217) 524-7525 www.illinoishistory.gov

St. Clair County

IHPA Log #005061815

Shiloh

New construction, National Geospatial Intelligence Agency relocation SE of Old Illinois 158 & Chocklaw Road, north of Scott Air Force Base COEKC

July 2, 2015

Laurie Farmer, NEPA Project Manager Department of the Army Corps of Engineers, Kansas City District 635 Federal Building 601 East 12th Street Kansas City, MO 64106-2824

Dear Ms. Farmer:

Thank you for initiating section 106 consultation with our office concerning the possible effects of the project referenced above on cultural resources. Our comments are required by Section 106 of the National Historic Preservation Act of 1966 (16 USC 470), as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties".

We look forward to working with you on this upcoming project.

If you have any further questions, please contact Joe Phillippe at 217/785-1279.

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Sincerely,

Rachel Leibowitz, Ph.D.

Deputy State Historic

Preservation Officer

From: Farmer, Laurie M NWK [mailto:Laurie.M.Farmer@usace.army.mil]

Sent: Monday, July 27, 2015 5:13 PM

To: rachel.leibowitz@illinois.gov; 'Phillippe, Joe' < Joe. Phillippe@Illinois.gov>; BREYER, KATY E GS-13 USAF AFMC AFCEC/CZOM koudelka@us.af.mil; KOUDELKA, ADAM J Maj USAF AFLOA JA/JACE-FSC adam.koudelka@us.af.mil; KOUDELKA, ADAM J Maj USAF AFLOA JA/JACE-FSC adam.koudelka@us.af.mil; KOUDELKA, ADAM J Maj USAF AFLOA JA/JACE-FSC adam.koudelka@us.af.mil; KOUDELKA, ADAM J Maj USAF AFLOA JA/JACE-FSC adam.koudelka@us.af.mil; KOUDELKA, ADAM J Maj USAF AFLOA JA/JACE-FSC adam.koudelka@us.af.mil; KOUDELKA, ADAM J Maj USAF AFLOA JA/JACE-FSC adam.koudelka@us.af.mil; KOUDELKA, ADAM J Maj USAF AFLOA JA/JACE-FSC adam.koudelka@us.af.mil; KOUDELKA, ADAM J Maj USAF AFLOA JA/JACE-FSC adam.koudelka@us.af.mil; KOUDELKA, ADAM J Maj USAF AFLOA JA/JACE-FSC adam.koudelka@us.af.mil; KOUDELKA, ADAM J Maj USAF AFLOA JA/JACE-FSC adam.koudelka@us.af.mil; KOUDELKA, ADAM J Maj USAF AFLOA JA/JACE-FSC adam.koudelka@us.af.mil; KOUDELKA, ADAM J Maj USAF AFLOA JA/JACE-FSC adam.koudelka@us.af.mil; KOUDELKA, ADAM JA/JACE-FSC adam.koudelka@us.af.mil; KOUDELKA, ADAM JA/JACE-FSC adam.koudelka@us.af.mil; ADAM JA/JACE-FSC adam.koudelka@us.af. COLLINGHAM, BRIAN J GS-11 USAF AMC 375 CES/CENPL collingham.1@us.af.mil; 'TAKACS, PAUL E GS-13 USAF AFMC AFCEC/CZOM' <paul.takacs@us.af.mil>; 'Carter Warren A Mr NGA-SIF USA CIV' <Warren.A.Carter@nga.mil>; 'Heigh Martin E NGA-SIF USA CTR' <Martin.E.Heigh.ctr@nga.mil>; 'Flauaus Richard J Mr NGA-SIOWE USA CIV' <Richard.J.Flauaus@nga.mil>; Koenig, Chris J MVS <Chris.J.Koenig@usace.army.mil>; Anderson, Lara MVS <Lara.Anderson@usace.army.mil>; Zender, Kira/ATL <Kira.Zender@CH2M.com>; Hayworth, Roberta L MVS <Roberta.Hayworth@usace.army.mil>; Missouri Preservation preservemo10@yahoo.com>; Bahr Barbara J NGA-OGCA USA CIV <Barbara.J.Bahr@nga.mil>; roed@stlouis-mo.gov; Malin-Boyce, Susan B MVS <Susan.B.Malin-Boyce@usace.army.mil>; 'Wiesen Arthur N Jr NGA-SIOWE USA CIV' <Arthur.N.Wiesen@nga.mil>; aweil@landmarksstl.org; Skinker, Richard A NWK < Richard.A. Skinker@usace.army.mil>; Deel, Judith MVS External Stakeholder <Judith.Deel@dnr.mo.gov>; Burke, Amanda <Amanda.Burke@dnr.mo.gov>; jennifer.mollenshott@gsa.gov; Laura Kennedy kennedy@achp.gov; 'STUEBBEN, GERHARD A CIV USAF AFLOA JACE/FSC' kennedy@achp.gov; 'STUEBBEN, GERHARD A CIV USAF AFLOA JACE/FSC' kennedy@achp.gov; 'STUEBBEN, GERHARD A CIV USAF AFLOA JACE/FSC' kennedy@achp.gov; 'STUEBBEN, GERHARD A CIV USAF AFLOA JACE/FSC' kennedy@achp.gov; 'STUEBBEN, GERHARD A CIV USAF AFLOA JACE/FSC' kennedy@achp.gov; 'STUEBBEN, GERHARD A CIV USAF AFLOA JACE/FSC' kennedy@achp.gov; 'STUEBBEN, GERHARD A CIV USAF AFLOA JACE/FSC' kennedy@achp.gov; 'STUEBBEN, GERHARD A CIV USAF AFLOA JACE/FSC' kennedy@achp.gov; 'STUEBBEN, GERHARD A CIV USAF AFLOA JACE/FSC' kennedy@achp.gov; 'STUEBBEN, GERHARD A CIV USAF AFLOA JACE/FSC' kennedy@achp.gov; 'STUEBBEN, GERHARD A CIV USAF AFLOA JACE/FSC' kennedy@achp.gov; 'STUEBBEN, GERHARD A CIV USAF AFLOA JACE/FSC' kennedy@achp.gov; 'STUEBBEN, GERHARD A CIV USAF AFLOA JACE/FSC' kennedy@achp.gov; 'STUEBBEN, GERHARD A CIV USAF AFLOA JACE/FSC' kennedy@achp.gov; 'STUEBBEN, GERHARD A CIV USAF AFLOA JACE/FSC' kennedy@achp.gov; 'STUEBBEN, GERHARD A CIV USAF AFLOA JACE/FSC' kennedy@achp.gov; 'STUEBBEN, GERHARD A CIV USAF AFLOA JACE/FSC' kennedy@achp.gov; 'STUEBBEN, GERHARD A CIV USAF AFLOA JACE/FSC' kennedy@achp.gov; 'STUEBBEN, GERHARD A CIV USAF AFLOA JACE/FSC' kennedy@achp.gov; 'STUEBBEN, CIV USAF AFLOA JACE/FSC' <a href= McGurk, Elizabeth < Elizabeth.R.Mcgurk@usace.army.mil>; BUSHMAN, WILLIAM H GS-13 USAF AFCEC AFCEC/CZN <william.bushman@us.af.mil>; 'MCCOY, MARK E CIV USAF AMC 375 CES/CEIEC' <mark.mccoy.1@us.af.mil>; 'KEHRER, DEBRA A CIV USAF AMC 375 CES/CEI' <debra.kehrer@us.af.mil>; 'SETTLE, KERRY S GS-13 USAF AFMC AFCEC/CZOM' <kerry.settle@us.af.mil>; 'ROEMER, ERWIN JR GS-13 USAF AFMC AFCEC/CZOM' <erwin.roemer@us.af.mil> Cc: Thomas.A.Reynolds@nga.mil

Subject: FW: Draft Meeting Minutes from July 8 2015 SHPO meeting (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

Please find attached the meeting minutes from the July 8, 2015 SHPO meeting. Below is the list of action items.

- 1. Action Item for USAF/NGA to send response letter to ACHP.
- 2. USAF/GSA to discuss next step on Section 110/106 for Disposal of Second Street.
- 3. A comprehensive list of all consulting parties that have been invited (attached); MO SHPO will make recommendations for additional parties.
- 4. Provide copies of meeting minutes. (attached)
- 5. Send out Purpose and Need Statement. (attached)

- 6. Roberta Hayworth/USACE will send changes to tribal 'whereas' to Lori Price/CH2M HILL.
- 7. CH2M HILL to send sub back and check the list update the findings. (CH2M completed, see separate summary in follow on email)
- 8. Send out Doodle Poll for next meeting time/date.
- 9. Laurie Farmer/USACE to see when Kate Kerr/ACHP is available.
- 10. Provide schedule milestones/timeline.
- 11. Provide copy of sign in sheet. (attached)

Laurie Farmer USACE - Kansas City District 601 East 12th Street Kansas City, MO 64106 816-389-3841 (desk) 816-673-5598 (mobile)

Classification: UNCLASSIFIED

Caveats: NONE

Next NGA West in St. Louis – NHPA Section 106 Programmatic Agreement Meeting #1

ATTENDEES: Please see sign-in sheet and list at end of

meeting minutes

PREPARED BY: USACE/CH2M HILL

DATE OF MEETING: 8 July 2015

Introduction:

Team members from USACE, NGA, USAF, and CH2M HILL met with representatives from the Missouri State Historic Preservation Office (SHPO) and representatives from the Illinois SHPO on 8 July in St. Louis, Missouri. Other consulting parties were there for part of the meeting — City of St. Louis, Missouri Preservation, and Landmarks Association of St. Louis. A representative from the ACHP was in attendance by phone for the first part of the meeting. The purpose of the meeting was to discuss the Section 106 Programmatic Agreement (PA) for the relocation of the NGA facility.

General Discussion:

The meeting was led by Laurie Farmer, the NEPA project manager with the Kansas City District of the US Army Corps of Engineers (USACE) and Lori Price, cultural resources lead with CH2M HILL. The meeting began with introductions of participants in room and on the telephone. Laurie Farmer/USACE provided an overview of the project with assistance from Matt Burkholder/NGA. Four alternatives are being analyzed in the EIS. A Draft EIS will be made public in September. An executed PA is needed before the ROD is signed. NGA is not planning on identifying a Preferred Alternative with the Draft EIS. In addition to environmental concerns, NGA is also considering issues such as mission impact, cost, and schedule in making the decision on which alternative to choose.

Laurie Farmer noted that Tim Meade had been the USACE Cultural Resources point of contact but that role is being transferred to Susan Malin-Boyce who was in attendance in the room. Also joining in the room were Chris Koenig and Lara Anderson, USACE archaeologists, as well as Roberta Hayworth, USACE Tribal Coordinator, all from the USACE St. Louis District.

The following are the highlights from the meeting, broken down by key topics.

Tribal Coordination:

Roberta Hayworth/USACE provided the following overview of the Tribal Coordination process to date: USACE sent letters out to 27 tribes and received six responses. Of the six that responded, four requested that they be notified if any archaeological sites are identified. The two tribes that requested to be consulting parties are the Peoria and the Osage (Illinois). The Osage and the Peoria received the archaeology reports on July 5, 2015. USACE will work with the tribes once an alternative is selected. At that time, they will discuss monitoring and other requirements and/or mitigation as needed. Roberta is keeping the tribes in the loop and she will send the Peoria and the Osage a copy of the draft final PA. The two tribes will have concurring party status. Roberta also sends an email each month to the tribes to touch base and provide a status update. If human remains are found at any time, all tribes are notified immediately.

Disposal of 2nd Street Facility:

NGA is moving out of their current location in 2022. NGA is a tenant of the facilities that are owned by the USAF (landlord). There will be some lag time between when NGA moves out and another tenant takes over. This PA is to look at the new location; a second PA or MOA would address the second undertaking of disposal of 2nd Street.

A question was asked regarding the timeframe for the second undertaking. The answer was that the USAF has to identify the property as excess property first.

Jennifer Mollenshott from GSA provided the following summary of the process:

GSA will be the lead on NEPA and Section 106 for disposition of the 2nd Street facility.

USAF does the Section 110 identification of historic resources prior to excess of property.

USAF will manage the property until disposal occurs.

GSA is responsible for mitigation of Adverse Effects.

It is part of GSA mission to address disposal of government buildings; therefore, GSA will receive funds to address the issue of disposal and mitigation through their budget allocation once the project has been through the excess declaration process.

A Phase 2 has been conducted on 2nd Street location; the cost of cleanup will need to be identified. GSA has a contract to conduct a Target Asset Review to identify issues associated with transfer of property and environmental cleanup liability.

ACHP:

Laura Kennedy from the ACHP noted that they are waiting on a response to their letter dated April 22, 2015. It was noted that NGA and USAF are working on a joint response letter.

Laura Kennedy requested a formal response letter; she noted that without the response letter ACHP was not able to commit to anything during the July 8 teleconference.

Jennifer Mollenshott of GSA noted that GSA may do a MOA or a PA for the disposition of 2nd Street, but it is too early to discuss Section 106 yet.

Erwin Roemer/USAF stated that he can't engage in discussion of the PA until we hear from the ACHP. Additional discussion continued about the two undertakings and the need for two separate Section 106 agreement documents.

Jennifer Mollenshott of GSA noted again that GSA would do Section 106 and NEPA compliance for the disposal of the 2nd Street property. There is a lot of due diligence needed before the report of excess can be completed.

Arrival of Representatives from Missouri SHPO:

Judith Deel and Amanda Burke of MO SHPO arrived late to meeting due to traffic on commute from Jefferson City.

Judith Deel/MO SHPO asked why the disposal of Second Street and development of the new location are not in one PA. She sees them as linked.

Lori Price/CH2M HILL noted that the timeframe for knowing the disposal options was a concern. Also that USACE is the lead agency for the new location and GSA is the lead agency for the disposal.

Judith Deel/MO SHPO stated that even though there are two lead agencies and the timing is 8-9 years until the disposal is under contract, a PA can have a life of 10 years, and the lead agency can be transferred from one government agency to another and a PA can accommodate that.

Jennifer Mollenshott of GSA reiterated that these are two separate undertakings, and stated that there are precedents for keeping the Agreement documents separate. Combining the two could impede the current NEPA process on the new location by delaying the ROD. Jennifer noted that this is an issue of appropriateness and that the GSA needs the report of excess to be completed before they can engage in Section 106. She then had to sign off the call but provided her cell phone number 817/978-7370 and her email address for further inquiries: Jennifer.Mollenshott@gsa.gov.

Erwin Roemer/USAF noted that the PA process should be postponed until ACHP can respond. Judith Deel/MO SHPO cited the regulations at 36 CFR 800 that require a consideration of the alternatives that led to the determination of disposal, and that there needs to be an explanation of the three or four alternatives analyzed. Lori Price/CH2M HILL noted that when we met in February, it was discussed that these were two separate undertakings and we decided that this PA would acknowledge the future disposition of 2nd Street in a 'whereas' clause. This acknowledgement would state that the disposal

undertaking would be conducted by a different lead agency at a later date. The adverse effects of the 2nd Street Relocation would not be addressed in this PA due to the schedule and timing of the relocation process.

Judith Deel/MO SHPO stated that the consultation is out of synch and wants to know what was discussed to determine that 2nd Street should be surplused.

Judith Deel/MO SHPO indicated that the PA should define that it is all part of the same undertaking but it can be acknowledged that another agency would be the lead for the disposition. The 'stipulations' section would identify the phasing of the project and which agency is in the lead for each step of the process. Judith Deel/MO SHPO has concerns about what is going to happen at 2nd Street - what were the alternatives analyzed, what about adaptive reuse of the facility. Need to explore the widest range of alternatives for that property.

Erwin Roemer/AFCEC/CZOM since Katherine Kerr/ACHP and Judith Deel/MO SHPO probably both see this as one undertaking, it is premature to discuss the PA today. Need a letter clarifying the approach and setting out the legal basis for why it is two undertakings. Also need ACHP to respond to June 19 letter inviting them to participate in this consultation. ACHP will probably wish to participate, and Katherine Kerr of ACHP is the primary case manager for DOD projects. She is out of the country on travel until the first week of August.

Laura Kennedy/ACHP noted that this is a priority for Katherine Kerr and that Katherine wants the response to their April 22 letter.

Art Wiesen-NGA St. Louis noted that it is a timing issue for GSA to report the property as excess. Section 110 will be conducted between the USAF and GSA.

Lori Price/CH2M HILL noted that this meeting was part of the early consultation process for Section 106. The purpose of this meeting was to discuss how to mitigate the potential adverse effects.

From this relocation process there is going to be a potential adverse effect from redevelopment, therefore we need to go forward and decide how to discuss this adverse effect.

Judith Deel/MO SHPO requested to see the analysis where the lead agency had documented the need to move the NGA facility from 2nd Street. She requested that all consulting parties see these supporting studies to determine why relocation would be best.

Matt Burkholder/NGA indicated a number of studies have been conducted and could be provided. Susan Malin-Boyce/USACE noted that the site study should be added as an attachment to the PA. Look and see if there is one that can be summarized that would provide more substantial info about why they need to move.

(NGA revision to minutes: As a follow up with NGA, additional information will not be distributed. As NGA suggested in the meeting, the Purpose and Need section in the draft EIS provides sufficient detail outlining the justification for the evaluation of a new property.)

NGA also reiterates that the disposition of 2nd Street and the evaluation of a new site are two separate actions as will be stated in the forthcoming response to the April 2015 ACHP letter.

NGA's departure from 2nd Street will not trigger a 106 Action because they do not own the land. That will be handled later when/if the Air Force announces the historic resource prior to excess under Section 110.)

<u>List of Action Items Requested During Morning Session (Action Items 1-6):</u>

- 1. NGA to provide background studies explaining why NGA had to leave 2nd Street.
- 2. USAF/NGA to send letter to ACHP in response to April 22 letter.
- 3. USAF/GSA discuss next step on Section 110/106 for Disposal of Second Street.

- 4. Judith Deel/MO SHPO requested a comprehensive list of all consulting parties that have been invited; MO SHPO will make recommendations for additional parties.
- 5. Provide copies of meeting minutes.
- 6. Provide Purpose and Need Statement.

Consulting Parties:

Lori Price/CH2M HILL noted that Betsy Bradley at City of St. Louis provided a list of the following organizations: Missouri Preservation, the Landmarks Association of St. Louis, and Tillie's Corner. The first two organizations were represented in the morning portion of the meeting by Bill Hart of Missouri Preservation and Andrew Weil of Landmarks Association of St. Louis. No representatives from Tillie's Corner were in attendance.

Judith Deel/MO SHPO stated that there is a need to open up the consulting party list to other parties. She mentioned that Andrew Weil may have some ideas about the City site. She noted that Andrew indicated that the 2nd Street property has state and national significance. She also noted the need to have a full and thorough analysis of the potential reuse of the 2nd Street facility, which she feels needs to start ASAP to avoid lag time during which the buildings are vacant.

GSA Excess Property Process:

Jennifer with GSA restated the GSA process which takes approximately one year:

- 1. Declare Property Excess
- 2. 30 day review by other federal agencies
- 3. Surplus process
- 4. Requirements of HUD suitability for homeless-60 day screen
- 5. Other public uses-30 day screen
- 6. Public conveyance screen-like a historical monument
- 7. Public sale

GSA would work with the USAF to document the excess property, complete the Section 110.

Need to look at National Register form for 2nd Street - it was written in the 1970s and does not say what the level of significance is or why it's significant (local, national, etc.)

Perhaps the nomination should be revised or updated. Perhaps the USAF should evaluate the level of significance.

Andrew Weil noted that the 2nd Street facility has history ranging from the 19th Century, Civil War, to current War on Terror. He stated that it is an important USAF and military site.

2nd Street Discussion Wrap Up:

Laurie Farmer/USACE wrapped up the 2nd Street conversation with the following action items:

- 1. Will work with NGA to get action items out NGA working on response letter to ACHP
- 2. Request that we discuss new location alternatives

Several meeting participants on the phone dropped off.

Laurie Farmer/USACE reported that geo-arch is going to start next week (week of July 13) at Fenton. At Mehlville no archaeology survey work has been done; if the site is selected then shovel tests or other appropriate surveys will likely need to be conducted.

Discussion of PA:

A discussion of the PA for the relocation was begun. Lori Price/CH2M HILL posted a digital version of the strawman PA document on the screen with the intent that the group would review. The purpose of the draft PA on screen is to provide a strawman to get the group started and get a dialogue going.

It was noted that a placeholder should be added referencing the other document (PA for disposition of 2nd Street) in the stipulations.

Judith Deel/MO SHPO suggested that the group skip the 'whereas clauses' since there were many diverse opinions, and that the group should go to 'stipulations.'

Roberta Hayworth/USACE has a few changes to tribal 'whereas' that she will send to Lori Price/CH2M HILL separately (Action Item-7). She restated what had been done for tribal consultation to date (see previous notes above).

Lori Price/CH2M HILL noted that text from the Purpose and Need had been incorporated in the third 'whereas.'

USACE to deliver the Purpose and Need statement to all consulting parties, and also background studies to help with understanding (Action Item-6).

Regarding the public comment 'whereas,' USACE has not decided how to proceed with this. NEPA public meetings are set for week of Sept 28. USACE will make it clear that the meetings are for both NEPA and Section 106. Public comments may be accepted via website and USACE may do public notices in the newspaper but this has not been fully determined at this time. The background section of the PA includes reference to the APE maps, map of St. Louis City Site showing historic properties, unanticipated discovery plan, and that all time periods in the PA are calendar days.

Susan Malin-Boyce/USACE recommended that USACE check with Office of Council about adding GSA as a consulting party; GSA is not funded to work on it (Action Item- 8).

Susan Malin-Boyce/USACE noted that the feasibility study could be added as an attachment. Look and see if there is one that can be used that would provide more substantial info about why they need to move.

Review of the Project Areas/APE by Site:

<u>Mehlville:</u> This alternative has the least cultural resource issues. Buildings date from the 1970s; there is landscaping and trees; no archaeological investigations have been done at this site. The cultural resources report says the site is not a high probability area, but if selected, basic shovel tests would need to occur. Part of the site is covered in trees - USACE provided a brief description of types of trees.

It was noted that the buildings date from the 1970s, so they are coming up on 50 years of age. Rachel Leibowitz/IL SHPO noted that they could be significant for architecture, or events, social history, landscape architecture, and designed landscape.

Judith Deel/MO SHPO recommended assessing the recent development history of the project to determine if the entire parcel was bulldozed or capped with fill prior to construction.

Laurie Farmer/USACE noted that about 12 acres in the southernmost portion of the property probably have not been disturbed. She also noted that USACE is in consultation with USFWS on the potential bat issue associated with the trees.

Lori Price/CH2M HILL noted that our cultural resources sub-consultant reviewed this building using a 45-year cut off. His opinion was that the building is not exceptionally important and does not need further review. It was noted that the report has gone to SHPO for 30 day review and that window has not closed.

<u>Fenton:</u> From the APE map it is apparent that Fenton is mainly a paved site - there are no structures except for fencing and a parking attendant shack. The area is completely disturbed from development. USACE and a geoarchaeologist are doing drilling next week (week of July 13) to determine depth of disturbance and potential for deeply buried deposits. Ed Hajic, the geoarchaeologist, has done early studies and he is anticipating a lot of disturbance. USACE will drill to bedrock. Ed Hajic is content with the drilling plan and feels like they are getting sufficient coverage.

St. Clair County: The architectural historian completed a review of the property. His determination was that the Scott AFB golf course was not eligible due to extensive changes that have occurred to the golf course. The golf course lacks integrity, therefore, USACE determined it to be not eligible. The property has been surveyed for archaeology and one site has been identified that was determined eligible. NGA cannot avoid it in design due to size and location. The archaeologists requested a 100-foot buffer but it could not accommodated. We have figures showing the location of the site but it was not distributed or presented

during the meeting due to confidentiality. Joe Phillippe from IL SHPO has the archaeology map showing the site. Lori Price/CH2M HILL talked to Joe Phillippe and they agreed USACE will have to do data recovery since the site can't be avoided. Impacts to the site will likely result in tribal consultation.

Rachel Leibowitz/IL SHPO stated the need to determine if there are curatorial needs for any artifacts. Due to budget cuts, as of Aug 8 the state museum that currently curates artifacts and manages the archaeology site files will be closed. The files may be moving. SHPO hoping to get site records transferred to their office. There is a 6-month agreement with DNR to manage these materials.

St. Louis City: The APE map was displayed showing the known historic properties, with the St. Louis Place National Register district hatched. It was noted that the project footprint encroaches into the historic district as well as the Buster Brown Blue Ribbon Shoe Factory, which is individually listed on NRHP. NGA tried to avoid the property through design, but could not do so because of force protection requirements. There are also a number of historic properties adjacent to the St. Louis City alternative, including the St. Stanislaus Kostka Church, Pruitt School, former Jefferson-Cass health center, and former Crunden Branch Library. There would be no physical impacts to these structures, just visual impacts. The Frank P. Blair School is a contributing element to the district and is also individually listed. The district wraps around the St. Louis City Site on two sides; there are visual impacts but not physical impacts.

Several buildings within the project footprint are not eligible primarily due to lack of integrity.

MO SHPO Eligibility Determination/Response to Letter:

Amanda Burke/MO SHPO indicated that there were additional resources in SHPO files that were not included in the report. Before SHPO can make a determination, this information needs to be reviewed. The info is listed in the Section 106 properties log; perhaps the sub-consultant overlooked it. SHPO declined to provide specifics on which properties were missed. CH2M HILL will need ensure the research is completed and the report is revised as needed.

CH2M HILL to send sub-consultant back to check the list and update the findings (Action Item-9).

St. Louis City Site Update:

Don Roe, St. Louis City Planner, stated that Betsy Bradley, City's Historic Preservation Officer, could not attend the meeting. He discussed the number of parcels in the area and how many are vacant. Lori Price/CH2M HILL noted that the cultural resources report specifies the number of demolitions and the percentage of remaining buildings compared to how many structures used to be there. She noted that the Blighting Study reports the number of vacant properties in the proposed project area.

Mr. Andrew Weil/ Landmarks Association of St. Louis indicated that he did not have any comments on the St. Louis City Alternative once he found out that St. Stanislaus would only have a visual effect to it.

Lori Price/CH2M HILL noted in an overarching comment that we have not received SHPO concurrence yet, so some of the historic properties listed in the PA might change.

Discussion of Mehlville Alternative Stipulations -

Judith Deel/MO SHPO noted that the tribes may want to participate if this alternative is picked, so we shouldn't state that deep testing won't occur; change it to something like "methodology will occur through consultation." The Mehlville cultural resources report did not recommend deep testing, but since tribes are not here, don't count this out, leave open methodology for tribes to discuss.

Following discussion, text changed to: "If the Mehlville Alternative is selected, consultation shall occur with SHPO and the Peoria and Osage tribes, as appropriate, to determine the appropriate methodology." Text stating deep testing would not occur was deleted.

Judith Deel/MO SHPO suggested covering unanticipated discoveries as one clause.

Judith Deel/MO SHPO requested we build in flexibility for review time. Lori Price/CH2M HILL noted that three federal agencies had to reviewed strawman PA before it went out and that took some time. Judith Deel/MO SHPO says we need to abide by timelines in the regulations.

Judith Deel/MO SHPO noted that stipulations for mitigation should be worked out after the alternative location is selected.

Judith Deel/MO SHPO suggested we group archaeology of the three MO alternatives together. Depending on which one is selected, then the consultation shall take place to determine the appropriate methodology. Roberta Hayworth/USACE clarified that if remains are found during deep boring, it is not the Federal agency's responsibility to take care of the remains since it is private property. It will fall under the state regulations. But USACE takes care of tribal coordination. Rachel Leibowitz/IL SHPO suggested that we differentiate between unanticipated discovery terminology and "undiscovered to date."

Proposed Schedule for PA Process:

Lori Price/CH2M HILL provided the following summary on the PA process schedule:

CH2M HILL reviews comments from consulting parties.

CH2M HILL prepares a new draft at the end of August, if that works with schedules and gives sufficient time to reviewers.

We would like to have a draft by end of September to take public comments at the public comment meetings in September.

Discussion of St. Louis City Alternative Stipulations:

Martin Heigh/NGA/SIF CTR asked "What is the City's role in obtaining property?"

Don Roe with City of St. Louis noted that the City is going full bore to own all property so they can be in a position to convey to the federal government as one parcel. He noted that there are some concerns about relocation of the church, but things are happening and the City is working in earnest to accomplish this task. Judith Deel/MO SHPO brought up a concern about how many actions taken to prepare an alternative location may result in a foreclosure situation. Don't want to take any actions that would circumvent Section 106, like demolition or excavations.

Don Roe/City of St. Louis made two comments. First the City has a redevelopment system in place and they will follow the process. Secondly, even if NGA does not select the alternative, much of the area has been vacant for years, and if it's not used for a federal agency, then someone else will redevelop it. Judith Deel/MO SHPO noted that in the event that the St. Louis City alternative is not chosen, and then is later used by HUD, the City needs to make note of process. Don Roe/City of St. Louis will share information with City Preservation Office staff (Betsy and Jan).

General recommendations for PA:

Stipulation V: covers all archaeological properties

Judith Deel/MO SHPO suggests making unanticipated discoveries its own stipulation.

Judith Deel/MO SHPO suggests changing title of Stipulation V to "Treatment of Historic Properties" so it does not cover just archaeology, due to the length of time of the project and the age of buildings.

Judith Deel/MO SHPO suggests calling out the appropriate mitigation measures for architecture separately. Judith Deel/MO SHPO agrees with covering IL alternative separately, as currently shown.

Rachel Leibowitz/IL SHPO, in response to Lori Price/CH2M HILL, says yes, keep IL in unanticipated discoveries for safety net in Stipulation V, just in case something is found.

Rachel Leibowitz/IL SHPO stated preference is for avoidance of the known archaeological site at the St. Clair County alternative; make all good faith efforts to incorporate tribal concerns, other consulting parties, and SHPO. If avoidance is deemed not feasible, then we move to data recovery discussions.

Laurie Farmer recapped the Path Forward for the PA:

Discussed time period for consulting parties to get more markups in to Lori Price/CH2M.

Lori Price/CH2M HILL to prepare real first draft based on today's discussion and any subsequent comments received; will recirculate that draft at the end of August.

Then everyone has time to make edits and comments and send to Lori Price/CH2M.

Lunch Break - only Mark McCoy from Scott AFB rejoined the call

St. Clair County alternative - Lori Price/CH2M HILL provided brief overview.

St. Louis City alternative: Lori Price/CH2M HILL provided a brief overview of her sidebar conversation with Andrew Weil/Landmarks Association of St. Louis before he left the meeting. He noted that he had concerns about St. Stanislaus Church but was okay to hear it would only be a visual impact. Other than that, he had no concerns about the St. Louis City alternative. Lori Price/CH2M HILL asked him to send some mitigation suggestions regarding the St. Louis City alternative and he said he would.

Judith Deel/MO SHPO stated that the proposed demolition of the Buster Brown building is a surprise to them. Based on the concerns of the ACHP as expressed in their letter, MO SHPO is not prepared to talk about mitigation.

Amanda Burke/MO SHPO stated that the demolition of Buster Brown was expressed through the ACHP letter, but she felt it should have been a formal notification to SHPO.

Rachel Leibowitz/IL SHPO asked where NGA/USACE were in design development. Martin Heigh/NGA/SIF CTR replied that there are notional layouts of square footage and set back requirements but no design yet. Judith Deel/MO SHPO reminded the group that consultation is a process, needs to be documented and shared, and all parties should be made aware of things. She would like a phone conference with other consulting parties. Conversation should include multiple parties and must have the concerned citizens.

(NGA Revision to minutes: In initial discussions with the City of St. Louis, but we are asking for their leadership and will be asking for leadership from St. Clair County with these conversations to be conducted.)

Judith Deel/MO SHPO noted that during the February meeting she had requested the documentation of alternatives.

What about the residents in North St. Louis? They should be kept informed, but they won't be consulting parties.

Judith Deel/MO SHPO said we can speak broadly about mitigation but cannot speak to specifics.

We are talking mitigation, but not addressing the mitigation for 2nd Street.

For 2nd Street, need a historic properties management plan and economic study; what is the possible redevelopment; who are possible occupants for 2nd Street.

Mitigation Options:

General discussion of possible mitigation ideas followed, including:

Oral history of entire neighborhood.

HABS or state level recordation.

Offsite mitigation-similar building would be rehabilitated.

How much information is there on the historic development of the area?

Need to talk to the City of St. Louis Cultural Resources office and get their observations.

Could ask Landmarks Association about local politics, local history, what options are out there for interpretation and education?

What kind of contexts have been written and which ones are needed? Judith Deel/MO SHPO said City of St. Louis did develop a city preservation plan that laid out property types in 1995. Some of these are completed (Flounder House and Mid-Century Modern). Is there a context that needs to be done or updated? What is the vehicle for these? Publications, outreach, paper vs. online publication?

Need creative mitigation ideas. HABS documentation is the least helpful. Needs to be something the public benefits from.

Websites.

Develop lesson plans, public school curriculum.

Judith Deel/MO SHPO says creative mitigation can come from the group, but need to wait until we understand where we are going.

Rachel Leibowitz/IL SHPO says she appreciates that we are having an early meeting.

Lori Price/CH2M HILL conveyed that Betsy Bradley/City of St. Louis had indicated she was not very interested in HABS, but was more interested in offsite mitigation, like repair and stabilization of other buildings outside the footprint. Betsy also said that having another survey for another neighborhood was not something they really needed.

Lori Price/CH2M HILL relayed that Andrew Weil had an interesting idea to re-do the NRHP nomination for Second Street.

Susan Malin-Boyce/USACE suggested mini-consultations for each group for the four alternatives, consultation in units to develop the relevant parts and documentation for each alternative. There is also an Environmental Justice component in St. Louis that needs to be addressed; this could bring more input into the Section 106 process.

Judith Deel/MO SHPO stated PA is big picture; may be more appropriate for the document to go back to the approach for archaeology. Appropriate parties would be invited to determine what the appropriate mitigation would be, which may include but not be limited to...

Laurie Farmer/USACE said we maybe could do these break out meetings in conjunction with NEPA meetings. Judith Deel/MO SHPO stated we need to make sure we get people's feedback on mitigation, and tell them how they can be involved.

Rachel Leibowitz/IL SHPO gave an example of a Springfield IL documentary film.

Judith Deel/MO SHPO said this is a PA for process. Get the process figured out, not the details.

Lori Price/CH2M HILL clarified that this is a PA to address the known and potential adverse effects at potential alternative locations.

Erwin Roemer/USAF stated PA is to address uncertainties.

Lori Price/CH2M HILL stated that in her experience, it is better to take mitigation options to the public and give then some examples; that way you get better feedback from public.

Erwin Roemer/USAF suggested PA stipulations don't contain specific mitigations but have an attachment with some examples of potential mitigation, non-binding. Attachment can be amended later after PA signed. Judith Deel/MO SHPO stated that a limited number of consulting parties suggested these ideas. Andrew Weil says there are nationwide organizations that have interest, such as military historians, due to 2nd Street. Judith Deel/MO SHPO said they can move forward with what is drafted but she is uncomfortable without others having a voice.

Laurie Farmer/USACE stated there was probably not a lot more discussion for today so let's do path forward.

Path Forward

Lori Price/CH2M HILL to accept additional feedback.

Lori Price/CH2M HILL to prepare first draft of PA and send back out to all consulting parties.

Goal is to try to have a draft ready for the public meeting.

Next meeting in September-mid Sept or same week as public hearing? (face to face or by phone?)

Judith Deel/MO SHPO suggested we pick a week and use doodle poll to pick a day and time. (**Action Item-10**) Judith Deel/MO SHPO needs a minimum of two weeks to review the PA. Will try to prioritize, but plan on 30 days.

Rachel Leibowitz/IL SHPO says she can do it depending on state budget.

Discussion on what would the time frame be to have the PA on the web for the public?

Roberta Hayworth/USACE gives the tribe 45 days; any time after mid-Sept. they are done with weekend ceremonies.

Lori Price/CH2M HILL suggested posting it a week before public meeting.

We would also have it at the public meeting.

Give public 2-3 weeks to provide comments after meeting.

Laurie Farmer/USACE to find out dates when Kate Kerr/ACHP is available. (Action Item-11)

Laurie Farmer/USACE gave a recap:

Any additional feedback please provide to Lori Price/CH2M HILL by this Friday, July 10

Lori Price/CH2M HILL will revise PA by July 31

Judith Deel/MO SHPO is out last week of July

Two weeks to review then can reissue?

Judith Deel/MO SHPO says email or conference calls are better to meet their budget, so prefer to provide comments via email. Need to make sure they have their 30 days to review.

Judith Deel/MO SHPO suggested a useful follow-up would be milestones with dates. (Action Item-12) Susan Malin-Boyce USACE suggests we include a timeline to keep everyone on track.

Action items from overall meeting:

- 1. Action Item to provide background studies explaining why NGA had to leave 2nd Street.
- 2 Action Item for USAF/NGA to send response letter to ACHP.
- 3. USAF/GSA to discuss next step on Section 110/106 for Disposal of Second Street.
- 4. A comprehensive list of all consulting parties that have been invited; MO SHPO will make recommendations for additional parties.
- 5. Provide copies of meeting minutes.
- 6. Send out Purpose and Need Statement.
- 7. Roberta Hayworth/USACE will send changes to tribal 'whereas' to Lori Price/CH2M HILL.
- 8. Susan Malin-Boyce/USACE recommended that USACE check with Office of Council about adding GSA as a consulting party, as GSA is not funded to work on Section 106 for this undertaking.
- 9. CH2M HILL to send sub back and check the list update the findings.
- 10. Send out Doodle Poll for meeting time/date.
- 11. Laurie Farmer/USACE to see when Kate Kerr/ACHP is available.
- 12. Provide schedule milestones/timeline.
- 13. Provide copy of sign in sheet.

Meeting Attendees:

Chris Koenig, USACE

Lara Anderson, USACE

Roberta Hayworth USACE

Bill Hart, Missouri Alliance for Historic Preservation

Barbara Bahr, NGA Legal

Don Roe, City of St. Louis Planning Department

Susan Malin-Boyce, USACE STL

Art Wiesen, NGA

Andrew Weil, Landmarks Association of St. Louis

Laurie Farmer, USACE

Rachel Leibowitz, IHPA (IL SHPO)

Katy Breyer, AFCEC

A.J. Koudelka, AFLOA/FSC-ELO

Brian Collingham, 375 CES/CENPL

Paul Takacs, AFCEC/CZO

Warren Carter, NGA/SIF

Martin Heigh, NGA/SIF CTR

Rich Flauaus, NGA SIOWE STL

Richard Skinker, USACE

Judith Deel, MO SHPO

Amanda Burke, MO-SHPO

Kira Zender, CH2M HILL Lori Price, CH2M

On phone:

Jennifer Mollenshott, GSA
Laura Kennedy, ACHP
Gerhard Stuebben, AFLOA
Lizzy McGurk, USACE Office of Council USACE Kansas City District
Bill Bushman, AF NEPA CTR
Mark McCoy, Archaeologist, Scott AFB
Deb Kehrer, Real Property, Scott AFB
Kerry Settle, AFCEC/CZOM
Erwin Roemer, USAF/Wright Patterson

NGA Programmatic Agreement Meeting: July 8, 2015

Name	Affiliate	Phone Number(s)	Email
LORI PRICE	C +1 2 m	727-560-4503	LORI. PRICE CH2M
LAURIE FARMER	USACE	816-673-5598	Laurie.m.farmer@usace.army.mil
RACHEL LEBORDITZ	IHPA (SHIO)	217-785-5031	radiel. lesbouritz@illihois.go
KATY BREYER	AFCEC	618 - 229-0812	Katy. breyer Ous. af. mil
A.J. Koudelka	CUS AGTORE) AFLOA/FSC-ELO	713-252-5910	adam. KoudelKa@useat.mil
Brian Collingham	375 CES/CENPL	618 - 256 - 2465	brian. collingham. (@us.af.mi/
PAUL TAKACS	AFCEC/CZO	618.229.0782	paul. takacs@us. af.mil
Warren Carter	NGA/sIF	314-676-3293	Warren A. Carter enga. mil
Marin Heigh	NGA (SIF	571 - 557 - 9777	martin.e.heigh @nga.mil
Rich Flauaus	NGA/SIOWE	314-676-3664	richard j . Slauause nga. mil

Name	Affiliate	Phone Number(s)	Email
Chris Koenig	USACE	314-331-8151	Chris.j. Koenig@ usace. army.mil
LARA ANDERSON	ST. LOUIS USACE	314-331-8779	land anderson Qusace ARMY MIL
KIRA ZENDER	CHZM	404-966-0821	Kzender@ch2m.com
Roberta Hayworth	St Louis USACE		roberta. I. hayworth @usere, army, mil
WM HART	MO AULANCE FOR HISTORIC PRESERVATION	212 1091 1941	preservemo 10 @ yahoo, com
BARBARA BAHL	NGA	314-676-0422	barbara.j. bahr enga.mil.
Dow Rose	City of 5760013	(314)657-3848	ROEDESTLOUIS-MO.GOV
Busan Kalin-Boyce	USACE	314 331 8804	BUSAN. B. MALIN-BOYCE DUSACE. Army Mil
ART WIESEN	NGA	314 676 3289	ARTHUR. N. WIESEN@ NGA. MIL
Andrew wed	Landmarks Assoc sth.	314-421-6474	aweilclandnaks-SH-org

Name	Affiliate	Phone Number(s)	Email
nichard Skinker	USACE	316-225-3793	Ciched 6. SKNKE-@ USGCE WMy is
JUDITH DEEL	Mo-5480	573-751-7862	Judoh, Deal Down. no. got
Amanoa Burko	MO-SHPS	573-522-464/	amanch. bucke @ dar. Mos
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DEPARTMENT OF THE ARMY CORPS OF ENGINEERS, KANSAS CITY DISTRICT 635 FEDERAL BUILDING 601 E 12TH STREET KANSAS CITY MO 64106-2824

RECEIVED

JUN 1 8 2015

OS 5 06 18 15

PRESERVATION SERVICES

Ms. Amy Martin
State Historic Preservation Officer
Illinois Historic Preservation Agency
1 Old State Capitol Plaza
Springfield IL 62701-1507

y CONCUR

By: Rachel Le by TZ

Deputy State Historic Preservation Officer

8-20-15

H/A
ACC 8/20/15
AR
File -5/COEXC

June 15, 2015

RE: Section 106 Consultation for National Geospatial Intelligence Agency Action

Dear Ms. Martin,

In compliance with Section 106 of the National Historic Preservation Act, the U.S. Army Corps of Engineers, Kansas City District (USACE), initiated informal consultation with your office at the agency scoping meeting for the Environmental Impact Statement for National Geospatial Intelligence Agency (NGA) Action in St. Clair County, Illinois, on December 10, 2014. With this correspondence, U.S. Army Corps of Engineers, Kansas City District, is formally initiating Section 106 consultation on the proposed relocation of the NGA, currently located in St. Louis, Missouri. The undertaking is defined as the construction and operation of a new NGA facility capable of meeting current and future mission requirements.

Background data collection, literature review, and preliminary site visits for all four alternative locations were completed by Brockington and Associates, the project cultural resource consultants. The technical memoranda for the St. Clair County, Illinois site presenting the results of the background research and preliminary field work are enclosed for your review and comment. Field work at this site consisted of an examination of the built environment. No shovel testing or other subsurface survey was undertaken. One archaeological site in the project footprint, Site 11S825, was previously determined eligible for the National Register of Historic Places (NRHP). Two other sites - 11S934 and 11S935 – are not considered eligible and we request your concurrence with the finding that no further management consideration is needed for these two sites. One building, Facility 295, an Integrated Logistics Support Marker Beacon Facility (ILS), was identified within the project tract, and the Cardinal Creek Golf Course was identified within the Area of Potential Effects. We request your concurrence with our determination that neither of these two properties is eligible for the NRHP.

Because the alternative for the undertaking has yet to be selected, the undertaking has the potential to cause an adverse effect on historic properties, including Site 11S825. Due to the size and location of the archaeological site, it may not be possible to avoid impacts to the site if the St. Clair County alternative is selected as the Preferred Alternative. USACE has elected to pursue a Programmatic Agreement per 36 CFR 800.14(b)(1)(ii) to resolve the potential adverse

SUBJECT: Section 106 Consultation for National Geospatial Intelligence Agency Action

effects to historic properties under all alternatives being considered. We are currently planning a consultation meeting to discuss the Programmatic Agreement and will contact you shortly regarding dates and your availability. Ms. Lori Price with CH2M Hill will be coordinating the development the programmatic agreement for the effort.

We appreciate your time and look forward to continuing to consult with you on this important project. Please contact Mr. Richard Skinker, U.S. Army Corps of Engineers, Kansas City District, by telephone at (816) 389-3134 or myself at (816) 389-3841, or by email at NextNGAWest@usace.army.mil.

Enclosures

Laurie Farmer

NEPA Project Manager

cc: Joseph Phillippe, Illinois State Historic Preservation Office
Thomas Reynolds, National Geospatial Intelligence Agency
Erwin Roemer, AFCEC/CZO-Midwest
Lori Price, CH2M Hill



DEPARTMENT OF THE ARMY CORPS OF ENGINEERS, KANSAS CITY DISTRICT

635 FEDERAL BUILDING 601 EAST 12TH STREET KANSAS CITY MO 64106-2824

N2W Integrated Program Office

24 August 2015

Chairman Mark Kern St. Clair County Board 10 Public Square, Room B561 Belleville, Illinois 62220-1623

Dear Chairman Kern,

The 182-acre St. Clair County Site, located on Wherry Road near Shiloh, Illinois is currently one of the four remaining project locations under consideration for the new National Geospatial-Intelligence Agency (NGA) West building. As part of the planning efforts, the U.S. Army Corps of Engineers (USACE) and NGA met with you on August 18, 2015 to discuss Section 106 consultation and cultural resources mitigation planning. As discussed in our meeting, we are currently developing a Programmatic Agreement with both the Illinois State Historic Preservation Office (IL SHPO) and the Missouri State Historic Preservation Office (MO SHPO). The Programmatic Agreement (PA) is a formal agreement that will identify the terms for consultation, review, and compliance concerning cultural and historic resources. For all prospective site locations, we are requesting the respective landowners/public entities to assist with cultural resources mitigation planning efforts. The USACE will continue to lead the Section 106 consultation efforts with the SHPOs, but the mitigation plans to be integrated into the PA would be the responsibility of the current landowners. Technical reports prepared to date can be provided upon request. To maintain our schedule, we ask that the mitigation plan for the St. Clair site be completed by December 1, 2015 for inclusion into the PA.

Within the St. Clair County property, an archeological site (11S825) has previously been identified to possess significant research value; and is therefore eligible for listing in the National Register of Historic Places. If the St. Clair County site is chosen for construction, avoidance of this archeological resource would likely not be possible. Archaeological data recovery investigations should be anticipated, and carried out prior to initiation of construction activities. The SHPO is looking for creative ways to engage the public and document cultural resources for the public/share consumption as part of the mitigation process. Please work with a professional in this field to help generate ideas for mitigation. In relation to the Environmental Impact Statement, the USACE and our contractor (CH2M Hill) would also like to participate in discussions leading up to the completion of the mitigation plan.

If you have any questions related to this letter, please contact Ms. Laurie Farmer, National Environmental Protection Agency Project Manager at 816-389-3841, or by email at Laurie.M.Farmer@usace.army.mil. If you do not wish to perform the cultural resources mitigation efforts or any final survey work necessary for data recovery, please inform us via writing.

Christopher S. Prinslow, P.E.

N2W Program Manager



DEPARTMENT OF THE ARMY

CORPS OF ENGINEERS, KANSAS CITY DISTRICT 635 FEDERAL BUILDING 601 EAST 12TH STREET KANSAS CITY MO 64106-2824

N2W Integrated Program Office

AUG 25 2015

Otis Williams
St. Louis Development Corporation
1520 Market Street, Suite 2000
St. Louis, Missouri 63103

Dear Mr. Williams:

The 99-acre St. Louis City Site, located at the intersection of Jefferson Avenue and Cass Avenue in St. Louis, Missouri is currently one of the four remaining project locations under consideration for the new National Geospatial-Intelligence Agency (NGA) West building. As part of the planning efforts, the U.S. Army Corps of Engineers (USACE) and NGA met with you on August 18, 2015 to discuss Section 106 consultation and cultural resources mitigation planning. As discussed in our meeting, we are currently developing a Programmatic Agreement with both the Illinois State Historic Preservation Office (IL SHPO) and the Missouri State Historic Preservation Office (MO SHPO). The Programmatic Agreement (PA) is a formal agreement that will identify the terms for consultation, review, and compliance concerning cultural and historic resources. For all prospective site locations, we are requesting the respective landowners/public entities to assist with cultural resources mitigation planning efforts. The USACE will continue to lead the Section 106 consultation efforts with the SHPOs. but the mitigation plans, integrated into the PA, would be the responsibility of the current landowners. Technical reports prepared to date can be provided upon request. To maintain our schedule, we ask that the mitigation plan for the St. Louis City site be completed by December 1, 2015 so that it can be considered under the Section 106 consultation for inclusion into the PA.

There is one National Register of Historic Places (NRHP) listed architectural resource within the project tract (Buster Brown-Blue Ribbon Shoe Factory) and there is one NRHP listed property (St. Louis Place Historic District) that is both within and adjacent to the project tract. If the St. Louis City site is chosen for construction, avoidance of these architectural resources would likely not be possible. Furthermore, an archaeological methodology and testing strategy will need to be outlined as archaeological resources are anticipated within the project tract. Mitigation activities should be anticipated and carried out prior to initiation of all ground breaking activities. The SHPO is looking for creative ways to engage and benefit the public as part of the mitigation process. Please work with a professional in this field to help generate ideas for mitigation. The USACE and our contractor (CH2M Hill) for the Environmental Impact Statement would also like to participate in discussions on the formation of the potential mitigation plan.

If you have any questions related to this letter, please contact Ms. Laurie Farmer, NEPA Project Manager at 816-389-3841, or by email at Laurie.M.Farmer@usace.army.mil. If you do not wish to perform the architectural resources mitigation efforts or any survey work necessary for anticipated archaeological resources, please inform us via writing.

Sincerely,

Christopher S. Prinslow, P.E.

N2W Program Manager



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

OF NATURAL RESOURCES

www.dnr.mo.gov

September 11, 2015

Laurie Farmer Corps of Engineers, Kansas City District 635 Federal Building 601 E 12th St Kansas City, MO 64106

Re:

SHPO Project Number: **038-SLC-14**, Section 106 review of NGA project Cultural Resource Reports, St. Louis City and St. Louis County, Missouri (NGA)

Thank you for submitting additional information on the above referenced project for our review pursuant to Section 106 of the National Historic Preservation Act (P.O. 89-665, as amended and the Advisory Council on Historic Preservation's regulation 36 CFR Part 800, which require identification and evaluation of cultural resources.

We have reviewed the revised "Architectural Survey of the North St. Louis City Alternative Site." Based on the information contained within the report we identified two areas which we were unable to make determinations of eligibility for at this time. The first area within the report we identified two areas which we were unable to make determinations of eligibility for at this time. The first area within the report we identified two areas which was recorded as Resources F-2, G, H, and I. In addition to these resources, four involves a potential district on Mullanphy St. which was recorded as Resources F-2, G, H, and I. In addition to these resources, four potentially contributing resources identified by us by means of a Google walk were not included in the report, 2312 Mullanphy St. (just potentially contributing resources identified by us by means of a Google walk were not included in the report, 2312 Mullanphy St. (just potentially contributing resources identified by us by means of a Google walk were not included in the report, 2312 Mullanphy St. (just potentially contributing resources identified by us by means of a Google walk were not included in the report, 2312 Mullanphy St. (just potentially contributing resources identified by us by means of a Google walk were not included in the report, 2312 Mullanphy St. (just potentially contributing resources identified by us by means of a Google walk were not included in the report, 2312 Mullanphy St. (just potentially contributing resources identified by us by means of a Google walk were not included in the report, 2312 Mullanphy St. (just potentially contributing resources identified by us by means of a Google walk were not included in the report, 2312 Mullanphy St. (just potentially contributing resources identified by us by means of a Google walk were not included in the report, 2312 Mullanphy St. (just potentially contributing resources identified by us by means of a Google walk were not included in the report, 2312 Mullanphy St. (just potentially contributi

In order for our office to make a determination for these two areas in question, please submit an occupant history which outlines the residents, their years of residency, and their occupation while living in each of the properties. Any relationship to historic properties residents, their years of residency, and their occupation while living in each of the properties. Any relationship to historic properties residents, their years of residency, and their occupation while living in each of the properties. Any relationship to historic properties areas of significance for each district should such as the Buster Brown-Blue Ribbon Shoe Factory and history which explores potential areas of significance for each district should also be included. Finally, submit a digital copy of the Cultural Resources Survey for the revised NGA West project which includes also be included. Finally, submit a digital copy of the Cultural Resources Survey for the revised NGA west project which includes also be included. Finally, submit a digital copy of the Cultural Resources Survey for the revised NGA west project which includes also be included. Finally, submit a digital copy of the Cultural Resources Survey for the revised NGA west project which includes also be included. Finally, submit a digital copy of the Cultural Resources Survey for the revised NGA west project which includes also be included. Finally, submit a digital copy of the Cultural Resources Survey for the revised NGA west project which includes also be included. Finally, submit a digital copy of the Cultural Resources Survey for the revised NGA west project which includes also be included. Finally, submit a digital copy of the Cultural Resources Survey for the revised NGA west project which includes also be included. Finally, submit a digital copy of the Cultural Resources Survey for the revised NGA west project which includes also be included. Finally, submit a digital copy of the Cultural Resources Survey for the revised NGA west project which includes the submit and su

If you have any questions please write Missouri Department of Natural Resources, State Historic Preservation Office, Attn: Review and Compliance, P.O. Box 176, Jefferson City, Missouri 65102, or call Amanda Burke (573) 522-4641. Please be sure to include the SHPO Project Number (038-SLC-14) on all future correspondence relating to this project. If the information is provided via telephone call, please follow up in writing for our files.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

Toni M. Prawl, PhD Director and Deputy

State Historic Preservation Officer

TMP:ab

C: Erwin Romer, USAF Mark McMoy, USAF Betsy Bradley, CRO Katharine Kerr, ACHP





DEPARTMENT OF THE ARMY

CORPS OF ENGINEERS, KANSAS CITY DISTRICT 635 FEDERAL BUILDING 601 E 12TH STREET KANSAS CITY MO 64106-2824

7 October 2015

NGA Program Office

Toni M. Prawl, Ph.D.
Director and Deputy State Historic Preservation Officer
State Historic Preservation Office
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

RE: SHPO Project Number: 038-SLC-14 - Continuing Section 106 Consultation for New National Geospatial Intelligence Agency Facility

Dear Dr. Prawl,

In compliance with Section 106 of the National Historic Preservation Act, the U.S. Army Corps of Engineers, Kansas City District, initiated formal, written consultation with your office on June 15, 2015 on the proposed relocation of the National Geospatial Intelligence Agency (NGA), currently located in St. Louis, Missouri. The undertaking is defined as the construction and operation of a new NGA facility capable of meeting current and future mission requirements.

In your letter dated June 30, 2015, you concurred that the Church of the Living God (former Crunden Branch Library), City of St. Louis Fire Department Headquarters (Former Jefferson-Cass Health Center), and Pruitt School are eligible for the National Register of Historic Places (NRHP). You also concurred that resources A- F, the Pruitt-Igoe Electrical Substation, and Resources 1-5 are not eligible for the NRHP. You also concurred with the findings of the architectural surveys for the Fenton and Mehlville sites. In addition, you concurred with the recommendations of all three archaeological reports. We appreciate your prompt response and your concurrence with our determinations.

A geoarchaeology survey has been conducted at the Fenton site to determine the likely presence of deeply buried cultural deposits. The report is attached and concludes that no deeply buried prehistoric cultural deposits are likely to occur beneath the uppermost meter or less of the terrace sediment assemblages due to age and the impacts of plant construction and demolition. It recommends that no further subsurface testing be conducted for deeply buried prehistoric cultural deposits within the project area. We request your review and comments on the report, and your concurrence with its findings and conclusion.

Finding of Effect

Because the alternative for the undertaking has yet to be selected, the undertaking has the potential to cause an adverse effect on historic properties, including those located at the North St. Louis City location. As you know, the U.S. Army Corps of Engineers has elected to pursue a Programmatic Agreement per 36 CFR 800.14(b)(1)(ii) to resolve the potential adverse effects to historic properties under all alternatives being considered.

We appreciate your time and look forward to continuing to consult with you on this important project. Please contact Mr. Richard Skinker, U.S. Army Corps of Engineers, Kansas City District, by telephone at (816) 389-3134 or myself at (816) 389-3841, or by electronic mail at <a href="mailto:nextwodolor: Nextwodolor: "Nextwodolor: Nextwodolor: Nextwodolor:

Sincerely

taurie Farmer Project Manager

Enclosure

cc: Amanda Burke, State Historic Preservation Office Erwin Roemer, AFCEC/CZO – Midwest Thomas Reynolds, NGA Lori Price, CH2M



DEPARTMENT OF THE AIR FORCE HEADQUARTERS 375TH AIR MOBILITY WING (AMC)

9 October 2015

Colonel Laura L. Lenderman Commander, 375th Air Mobility Wing 101 Heritage Drive, Suite 375 Scott AFB IL 62225-5001

Ms. Caroline D. Hall
Assistant Director
Federal Property Management Section
Office of Federal Agency Programs
Advisory Council on Historic Preservation
401 F Street, Suite 308
Washington, DC 20001-2637

Dear Ms. Hall

This letter is in response to your letter of 22 April 2015 sent to Scott Air Force Base (Scott AFB) and the National Geospatial-Intelligence Agency (NGA) regarding the proposed vacation of the St. Louis Arsenal and the identification, construction, and operation of a new facility for NGA within the St. Louis, Missouri metropolitan area. That letter concluded with three requests for additional information. Each of those requests is addressed below.

What rationale, under Section 106, is NGA using to consider the vacation and re-use of its current facility as a separate undertaking from the construction of a new facility? The U.S. Army Corps of Engineers, Kansas City District (the Corps), acting on behalf of NGA, is the lead federal agency in the Section 106 process, and is developing a National Environmental Policy Act (NEPA) Environmental Impact Statement (EIS) for the undertaking. In accordance with 36 CFR 800.8(a), the Corps is integrating Section 106 consultation into (but not in lieu of) the NEPA process. The Corps initiated NEPA planning with a Notice of Intent published 10 November 2014 in the Federal Register, 79 FR 66704. The proposed action consists of all actions associated with selecting the site, and constructing and moving to the new facility. The EIS will consider all environmental impacts associated with the relocation effort, including alterations to the St. Louis Arsenal (if any) that are required to accomplish the move. Additionally, the Air Force and NGA intend to enter into a non-Section 106 agreement establishing financial responsibility for continued maintenance of the Arsenal in order to fulfill their NHPA Section 110(a) preservation responsibilities until GSA disposes of the property. This agreement will be included in the EIS as a mitigation measure, and we expect that it will be finalized in the next several months, prior to the release of the Record of Decision (ROD).

ENABLING RAPID GLOBAL MOBILITY

UNCLASSIFIED

The proposed action does not include eventual reuse or disposal of the Arsenal, which cannot be predicted at this time. Decisions about the Arsenal's disposition will not be made until after 2022 when the NGA expects to complete its relocation. These facilities are carried on Air Force property records. Once NGA has vacated entirely, Scott AFB will identify the property as excess and GSA will make it available to other Federal or local governmental agencies. If no agencies express interest, GSA will sell it to a private party and will consult to resolve adverse effects of the sale.

Because (a) there are different lead agencies for the relocation and reuse/disposal; (b) nothing in the NGA's relocation decision commits the Air Force and GSA to a future course of action; and (c) the EIS will include mitigation measures to avoid adverse effects while reuse/disposal is accomplished, we believe there are two separate undertakings and that a separate Programmatic Agreement or 36 CFR Section 800.6(c) Memorandum of Agreement is appropriate for each. This approach is similar to the Coast Guard's actions in closing and disposing of the Support Center on Governors Island, New York, and was found consistent with NHPA and NEPA by the U.S. District Court in Knowles v. United States Coast Guard, 1997 WL 141397 (S.D.N.Y. 1997).

Summarize discussion between the 375 ABW (sic from original letter) and NGA regarding NGA vacating the St. Louis Arsenal, including discussions on updating the current facility as an alternative to construction of a new facility. The NGA is aware of the NHPA Section 110(a)(1) requirement to use historic properties "to the maximum extent feasible" prior to constructing new buildings. During mid-2010 to March 2012, NGA conducted a series of planning studies including an Economic Analysis, Design Basis Threat Analysis, Qualitative Decision Study, and a Facilities Condition Assessment. Although these studies considered modernizing the Second Street facilities, NGA decided that it would be less costly, quicker and less disruptive to the NGA mission to build a new campus.

NGA did not consult with Scott AFB before deciding to vacate the Arsenal. Because NGA is not authorized to "own" real property, the property must be carried on the records of a nearby Federal agency. In this case, Scott AFB is the nearest entity that can own Real Property. Nevertheless, NGA is solely responsible for making the determination as to whether or not the facilities it occupies are adequate to accomplish its statutory mission and protect its employees. Therefore, there was no need for the NGA to involve the Air Force in studies that lead to a decision to build a new facility.

Define the undertaking(s) currently being considered by both the 375 ABW (sic) and NGA. The current undertaking, described at 79 FR 66704 (Enclosure 1), includes all actions related to the construction of a new campus and relocation of NGA personnel and equipment. The NGA departure is expected to be a phased effort, possibly taking as much as eight years. Once the move is completed, Scott AFB and GSA will develop a second undertaking focusing on disposal/reuse. The proposed site boundaries for prospective sites in the current undertaking are shown at Enclosure 2. A map depicting approximate property boundaries of the Second Street/Arsenal Facility is noted at Enclosure 3.

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We hope the above explains our perspective on this complex effort. For any questions please contact, respectively, Mr. Mark E. McCoy at (618) 256-9441 or e-mail: mark.mccoy.1@us.af.mil or Mr. Tom Reynolds at (571) 557-5077; thomas.a.reynolds@nga.mil.

Sincerely

Laura Lindumon LAURA L. LENDERMAN, Colonel, USAF Commander, 375th Air Mobility Wing

THOMAS J. BUKOSKI, AICP
Deputy Director Next NGA West Program
Management Office &
Director Facility Program Office
Security and Installations Directorate
National Geospatial-Intelligence Agency

Enclosures

Encl. 1 – Description of Current Undertaking (Federal Register)

Encl. 2 – Prospective Sites

Encl. 3 – Second Street Site (Approximate Property Boundaries)

Encl. 1 – Description of Current Undertaking (Federal Register)

66704

Federal Register/Vol. 79, No. 217/Monday, November 10, 2014/Notices

Planninglinvironmental/

ACTMasterWaterControlManualUpdate. By emailing act-wear®

usace.army.mif.

• By letter addressed to: Commander, U.S. Army Corps of Engineers, Mobile District, Atm: PD-El (ACT-DEIS), P.O. Box 2208, Mobile, Al. 36028.

Further information regarding the update of the Master Manual, including all available documents, background and historical information, and updates is available online at the Web site given almye.

Next Steps

No sooner than 30 days after filling the final EIS with USEPA and publication of the EPA Notice of Availability for the FEIS in the Federal Register, USACE will prepare a Record of Decision (ROD) which documents the final decision on the proposed action in regard to the update of the ACT Basin Master WCM and the individual project WCMs, summatize alternatives that were considered and relevant factors that were balanced in making the decision. and identify means that have been adopted to initigate for adverse effects. USACE will notify the public of the ROD in a nowsletter distribution to the project mailing list, press releases to local newspapers radio and television news, and on the project Web site.

Landon M. Raby.

Major, Deputy District Communider, Mobile District, U.S. Army Corps of Engineers. FR Doc. 2014-26619 Filed 11-7-14; 8:45 amj EILLING COCE 3720-58-P

DEPARTMENT OF DEFENSE

Department of the Army; Corps of Engineers

Notice of Intent To Prepare an **Environmental Impact Statement** Initiate the Public Scoping Period and Host Public Scoping Meetings for West Facilities Modernization, St. Louis, Missouri, Metropolitan Area

AGENCY: Department of the Army, U.S. Army Corps of Engineers, DoD, ACTION: Notice of Intent.

SUMMARY: Pursuant to the National Environmental Policy Act of 1969 (NEPA), as amended, the National Geospatial-Intelligence Agency (NGA) announces its intent to prepare an environmental impact statement (EIS) to analyze potential impacts to the quality of the human environment resulting from the proposed construction and operation of new, modern facilities in the St. Louis metropolitan area. The

U.S. Army Corps of Engineers (USACE). Kansas City District, will be the project manager for this EIS. This notice informs the public of the proposed action, announces the public scoping process, and solicits public comments to identify issues related to the proposed

DATES: The public scoping period begins with the publication of this notice in the Federal Register and will continue until January 19, 2015. All comments submitted or postmarked by January 19, 2015 will be considered in defining the scope of the RIS. Comments submitted or postmarked after that date will be considered to the extent practicable. For public scoping meetings, see SUPPLEMENTARY INFORMATION Section.

FOR FURTHER INFORMATION CONTACT: To provide written comments on the KIS, request to be added to the project mailing list, or for further information or questions about the EIS process, please contact Ms. Amy Blair, U.S. Army Corps of Engineers, Kansas City District by telephone at (616) 369-3303, by mall at Room 529, 601 E. 12th Street, Kansas City, MO 64100, or by electronic mall at NextNGAWest@usace.army mil.

SUPPLEMENTARY INFORMATION: The National Geospatial-Intelligence Agency readmin Geosphain-Interligence, or delivers geosphatal intelligence, or GEOINT, that provides a decisive advantage to warfighters, policymakers, intelligence professionals and first responders. Both an intelligence agency and combat support agency, NG/ fulfills the president's national security priorities in partnership with the intelligence community and the Department of Defense, NGA is headquartered in Springfield, Va., and has two major locations in St. Louis and Arnold, MÓ.

NGA is pursuing construction and operation of a modern facility in the St. Louis metropolitan area to better support its mission to provide timely relevant, and accurate geospatial Intelligence in support of national security. The proposed new facility will support NGA's current mission, improve its resiliency, and address challenges associated with its current facility located on Second Street in the city of St. Louis, including physical constraints and socurity requirements. The KIS will evaluate and disclose the impacts of constructing a new replacement facility and relucating NGA operations at alternative sites, in addition to a No Action Alternative.

No Action Alternative: The EIS will analyze the No Action Alternative. under which no new construction or telocation will occur

The Proposed Action will be to construct a new, modern West Facility in the St. Louis metropolitan area.

Alternatives will be developed during and following the public scoping period, and will consist of alternative sites for the new facility. The following six proposed site locations were initially identified through a site location study:

- Penton: 1050 Dadge Drive, Fenton, MO (southwest of St. Louis);
- · Mehlville: 13045 Tesson Ferry Road, St. Louis, MO (south of St. Louis):
- · NorthPark: 4800 N. Hanley Road, St. Louis (Ferguson), MO (northwest of St. Louis),
- North St. Louis City: Near the Intersections of Cass and North Jefferson
- St. Claft County: Along Interstate (I-04), adjacent to the northeast boundary of Scott Air Force Base (AFR), Illinois (east of St. Louis); and
- Welden Spring: 4700 Technology. Drive, Woldon Spring, MO (northwest of

Two of the six sites have since been removed from consideration. A portion of the NorthPark location has been sold and the remaining land does not meet NGA's requirements. Additionally, the Welden Spring location is no longer under consideration based on master planning review.

Scoping: Public scoping is being conducted through January 19, 2015, to provide the public with an opportunity to offer input on the scope of issues to be addressed and to identify issues related to the proposed action and alternative sites. As part of public scoping, NGA and the Corps of Engineers plan to hold three public scoping meetings in early December 2014. The dates and locations of the scoping meetings and other opportunities for public participation in the EIS process will be announced through news media in the St. Louis motropolilan area.

In addition to complying with NEPA and DoD planning guidance, scoping will be used to partially follill the public participation requirements of Section 106 of the National Historic Proservation Act (NHPA), Except whore subject to the confidentiality provision of Section 304 of the NHPA, all comments received during scoping will become part of a project administrative record and may be included as an appendix to the EIS. A Draft EIS Is

expected to be circulated for public comment in summer/fall 2015.

Jennifer L. Switzer. Chief, Planning Brunch, U.S. Army Corps of Engineers, Kansas City District. IFR Boc. 2011-26616 Filed 11-7-11; 0:45 ami

BILLING COCE \$720-58-P

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

Extension of Hearing Record Closure

AGENCY: Defense Nuclear Facilities Safety Board,

ACTION: Extension of hearing record clusure date.

SUMMARY: The Defense Nuclear Facilities Safety Board (Board) published a document in the Federal Register on September 25, 2014, (79 FR 57543] concerning notice of a public hearing and meeting on October 7, 2014 regarding safety culture at Department of Energy defense nuclear facilities. The Board stated in that notice that the hearing record would remain open until November 7, 2014, for the receipt of additional materials. The Board made the same representation at the conclusion of the hearing on October 7,

DATES: The Board now extends the period of time for which the hearing record will remain open to November 21, 2014, to accommodate the submission of additional documents to the hearing record.

FOR FURTHER INFORMATION CONTACT: Mark Welch, General Manager, Defense Nuclear Facilities Safety Board, 025 Indiana Avenue NW., Suite 700, Washington, IX: 20084–2901; (800) 788– 4016. This is a toll-free number.

Dated: November 4, 2014. Peter S. Winokur. Chairman [FR Hoc. 2014-26616 Filed 11-7-14: 8:45 am] BILLING COCE 3570-01-P

DEPARTMENT OF EDUCATION

[Docket Ho.: ED-2014-[CCD-0118]

Agency information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Corrective Action Plan (CAP)

AGENCY: Office of Special Education and Robibilitativo Services (OSERS), Department of Education (ED). ACTION: Notice,

SUMMARY: In accordance with the Paperwork Reduction Act of 1905 (44 U.S.C. chapter 3501 of seq.), ED is proposing an extension of an existing information collection.

DATES: Interested persons are invited to submit comments on or before December 10, 2014.

ADDRESSES: Comments submitted in response to this notice should be submitted electronically through the Federal eRulemaking Portal at http:// www.tegulations.gov by selecting Docket ID number BD-2014-ICCD-0118 or via postal mall, commercial delivery. or hand delivery. If the regulations govertee is not available to the public for any teason. ED will temporarily accept comments at ICDacketMgr@ed.gov. Please note that comments submitted by fox or email and those submitted after the comment period will not be accepted; KD will ONLY accept accepted; tarwin ONLT accept comments during the comment period in this mailbox when the regulations gov sile is not available. Written requests for information or comments submitted by postal mail or delivery should be addressed to the Director of the Information Collection Clearance Division, U.S. Department of Education, 400 Maryland Avenue SW., LBJ. Mailstop L-OM-2-2R310, Room 2E115. Washington, IX: 20202.

FOR FURTHER INFORMATION CONTACT: For specific questions related to collection activities, please contact Edward West. 202-245-0145.

SUPPLEMENTARY INFORMATION: The Department of Education (ED), in accordance with the Paperwork Reduction Act of 1995 (PRA) (44 U.S.C. 3506(c)(2)(A)), provides the general public and Federal agencies with an opportunity to commont an proposed, revised, and continuing collections of information. This helps the Department assess the impact of its information collection requirements and minimize the public's reporting burden. It also helps the public understand the Department's Information collection requirements and provide the requested data in the desired format, EO is soliciting comments on the proposed information collection request (ICR) that is described below. The Department of Education is especially interested in public comment addressing the following lasties: (1) is this collection necessary to the proper functions of the Department: (2) will this information be processed and used in a limely manner; (3) is the estimate of burden accurate: (4) how might the Department enhance the quality, utility, and clarity of the Information to be collected; and (5) how might the Department minimize the

burden of this collection on the respondents, including through the use of information technology. Please note that written comments received in response to this notice will be considered public records.

Tith of Collection: Corrective Action
Plan (CAP).

OMB Control Number: 1820-0694.

Type of Review: An axtension of an existing information collection. Respondents/Affected Public: State.

Local, or Tribal Governments Total Estimated Number of Annual Responses: 60.

Total Estimated Number of Annual

Burden Hours: 975.
Abstract: This data collection provides instructions and forms necessary for States to report the number of written, signed complaints; mediation requests; and hearing tenuests and the status of these actions with regards to children served under Part C of Individuals with Disabilities Education Act (IDEA) initiated during the reporting year. The form satisfies reporting requirements and is used by OSEP to monitor SEAs and for Congressional reporting

Dated: November 5, 2014. Tomakie Washington, Acting Director, Information Collection Clearance Division, Privacy, Information and Hecords Management Services, Office of Managericht.

IFR Doc. 2014-25650 Filed 31-7-14; 5:45 am! BLUNG CODE 4000-01-P

DEPARTMENT OF EDUCATION

[Docket No.: ED-2014-ICCD-0128]

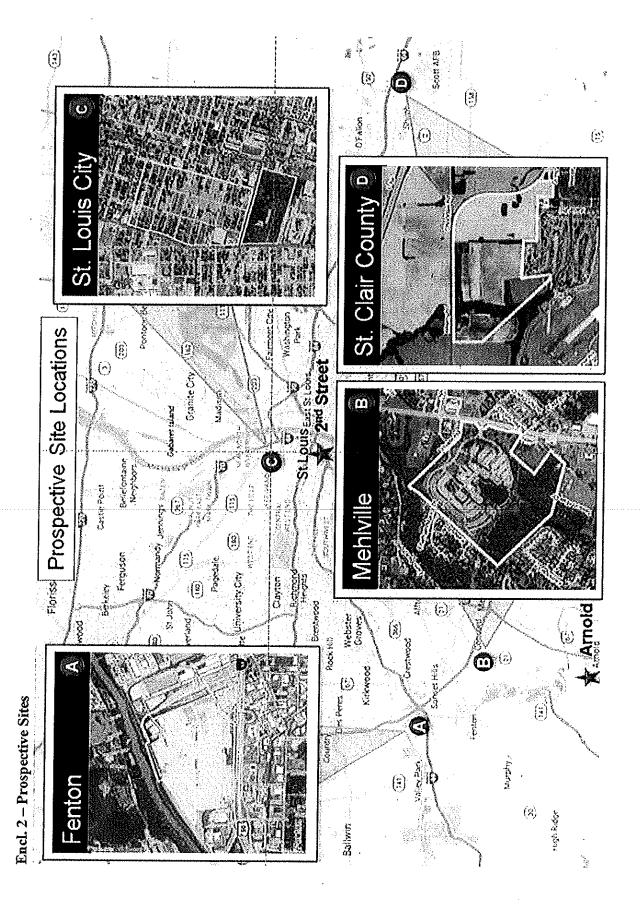
Agency information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Federal Family Educational Loan Program (FFEL)—Administrative Requirements for State, Not-For-Profit Lenders, and Eligible Lender Truslees

AGENCY: Federal Student Aid (FSA), Department of Education (ED). ACTION: Notice.

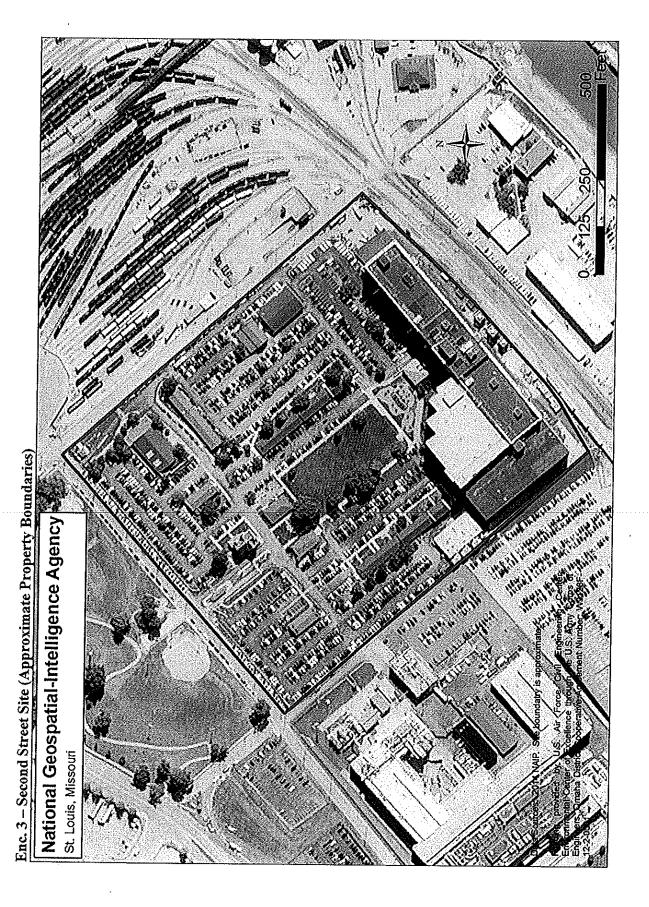
SUMMARY: In accordance with the Paperwork Reduction Act of 1995 (44 U.S.C. chapter 3801 *et seq.*), ED is proposing an extension of an existing information collection.

DATES: Interested persons are invited to submit comments on or before December 10, 2014.

ADORESSES: Comments submitted in response to this notice should be submitted electronically through the Federal oRulemaking Portal at https://



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Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

November 3, 2015

Laurie Farmer Corps of Engineers, Kansas City District 635 Federal Building 601 E 12th St Kansas City, MO 64106

Re:

SHPO Project Number: **038-SLC-14**, Section 106 review of NGA project Fenton Site Deep Testing, St. Louis County, Missouri (NGA)

Dear Ms. Farmer:

Thank you for submitting additional information on the above referenced project for our review pursuant to Section 106 of the National Historic Preservation Act (P.O. 89-665, as amended and the Advisory Council on Historic Preservation's regulation 36 CFR Part 800, which require identification and evaluation of cultural resources.

We have received and reviewed the report titled, "Geologic Potential for Deeply Buried Prehistoric Cultural Deposits at the NGA Alternative Location in Fenton, Missouri." We concur with the conclusions of the report there is no potential for intact archaeological sites.

If you have any questions please write Missouri Department of Natural Resources, State Historic Preservation Office, Attn: Review and Compliance, P.O. Box 176, Jefferson City, Missouri 65102, or call Amanda Burke (573) 522-4641. Please be sure to include the **SHPO Project Number (038-SLC-14)** on all future correspondence relating to this project. If the information is provided via telephone call, please follow up in writing for our files.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

Toni M. Prawl, PhD Director and Deputy

State Historic Preservation Officer

TMP:ab

C: Erwin Romer, USAF Mark McMoy, USAF Betsy Bradley, CRO Katharine Kerr, ACHP



Price, Lori/TPA

From: Farmer, Laurie M NWK <Laurie.M.Farmer@usace.army.mil>

Sent: Friday, November 06, 2015 12:09 PM

To: kkerr@achp.gov; rnelson@achp.gov; jeddins@achp.gov; alopez@achp.gov

Cc:

Burke, Amanda; Deel, Judith MVS External Stakeholder; rachel.leibowitz@illinois.gov;

'Phillippe, Joe'; Price, Lori/TPA; Kira Zender; Reynolds Thomas A Mr NGA-SIF USA CIV;

Heigh Martin E NGA-SIF USA CTR; Burkholder Matthew -Matt- A NGA-SIF USA CIV;

bradleyb@stlouis-mo.gov; Malin-Boyce, Susan B MVS; Koenig, Chris J MVS; ROEMER,

ERWIN JR GS-13 USAF AFMC AFCEC/CZOM; TAKACS, PAUL E GS-13 USAF AFMC

AFCEC/CZOM; Skinker, Richard A NWK; Switzer, Jennifer L NWK; Hall, Stephanie L NWK; Smith, Bryan A NWK; Prinslow, Christopher S NWK; Jeppson, Matthew P NWK; McGurk,

Elizabeth

Subject: PA Development for NGA and ACHP participation

Attachments: Advisory Council Invitation_FINAL.pdf; Joint Response from NGA and USAF.pdf

Dear Ms. Kerr and Advisory Council staff,

On behalf of the National Geospatial Intelligence Agency (NGA), the U.S. Army Corps of Engineers (USACE) has been coordinating the Section 106 process with both the Illinois State Historic Preservation Office (II SHPO) and the Missouri State Historic Preservation Office (Mo SHPO) to mitigate measures of potential adverse effects to cultural resources in association with the development of a new NGA campus. A Draft Environmental Impact Statement was released on October 9, 2015 for the effort, and it identified cultural resources that may be impacted at two of the four alternative site locations being evaluated. On June 19, 2015, USACE sent an invitation to the Advisory Council on Historic Preservation (ACHP) to participate in the development of a Programmatic Agreement (PA) for the new site location (see attached). We are looking to resume the discussions on the PA for the new locations with the two SHPOs and any interested stakeholder groups, and are trying to understand if the ACHP will be participating in the effort.

A meeting for the Programmatic Agreement was held in St. Louis, Missouri on July 8, 2015, and Ms. Laura Kennedy from the ACHP attended via telecommunication, but did not participate in the effort. It was identified that the ACHP was waiting for a formal joint response to a letter sent to the NGA and the U.S. Air Force on April 22, 2015 prior to participating. A joint response was sent to your office on October 19, 2015 clarifying that there are two separate undertakings 1) for the new site location and 2) for the disposition of the NGA facilities at NGA's Arsenal location. As the response letter states, any decision in regards to the disposition of the Arsenal site will not be made until after 2022 when the Air Force identifies the site as excess and the General Services Administration will then make it available to other Federal or local governmental agencies. Please find attached a copy of the letter if you have not received it.

NGA, the Air Force, USACE, the two SHPOs, and other consulting parties are looking to resume consultation on the Programmatic Agreement for the new site locations. I have also received inquiries from Anthony Lopez within the ACHP regarding the effort (as he received notification through the EIS release), and have copied him on this email for situational awareness. I am prepared to send you any background and technical information necessary to get your agency caught up. Please let us know of your intent regarding the ACHP's participation in the consultation. We would like to hold a meeting to go over the most recent draft during the week of December 7, 2015. I will be sending a Doodle poll to see if folks on December 7, 8, and 9, and will be getting a feel whether attendees would like to participate in person or via phone. The latest draft will be going to all consulting agencies under separate cover early next week.

Lastly, we request that any future communication regarding the new location be sent to the U.S. Army Corps of Engineers to expedite coordination efforts and resolution of issues.

Thank you,

Laurie Farmer NEPA Project Manager USACE - Kansas City District 601 East 12th Street Kansas City, MO 64106 816-389-3841 (desk) 816-673-5598 (mobile) 1 Old State Capitol Plaza, Springfield, IL 62701-1512

FAX 217/524-7525 www.illinoishistory.gov

St. Clair County

PLEASE REFER TO:

IHPA LOG #005061815

Shiloh

SE of Old Illinois 158 & Chocklaw Road, north of Scott Air Force Base

COEKC

New construction, National Geospatial Intelligence Agency Relocation

November 10, 2015

Laurie Farmer, NEPA Project Manager Department of the Army, Corps of Engineers, Kansas City District 635 Federal Building 601 East 12th Street Kansas City, MO 64106-2824

Dear Ms. Farmer:

Thank you for requesting comments from our office concerning the possible effects of the project referenced above on cultural resources. Our comments are required by Section 106 of the National Historic Preservation Act of 1966 (16 USC 470), as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties".

We have reviewed the mitigation plan and find it to be acceptable. We look forward to working with you on the programmatic agreement. If you have any questions please contact Joe Phillippe at (217 758-1279) or joe.phillippe@illinois.gov.

Sincerely,

Rachel Leibowitz, Ph.D.

Deputy State Historic

Preservation Officer

RL/JSP

c: Tim Cantwell, MidAmerica St. Louis Airport

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Thank per lock, and the Lay Section 188 of the Levicial Historic Fraestradan Act of 1868 (18 USC 470), as amended, real Ba



DEPARTMENT OF THE ARMY

CORPS OF ENGINEERS, KANSAS CITY DISTRICT 635 FEDERAL BUILDING 601 E 12TH STREET KANSAS CITY MO 64106-2824

Director Toni Prawl State Historic Preservation Officer Missouri Department of Natural Resources P.O. Box 176 Jefferson City, MO 65102

November 16, 2015

RE: SHPO Project Number: 038-SLC-14 Section 106 Review of NGA project Cultural Resource Reports, St. Louis City and St. Louis County, Missouri (NGA)

Dear Director Prawl,

Please find enclosed the additional documentation requested by your office in a letter dated September 11, 2015. The additional detail has been prepared by U.S. Army Corps of Engineers (USACE) staff, and is provided to help assist with any final determinations for the St. Louis City site. The St. Louis City site is one of four locations under consideration for the new National Geospatial-Intelligence Agency N2W campus.

The attached report provides historical context and general characterization of area immigration and settlement at the St. Louis City site location. As requested, it offers more detailed information about individual residents, occupant history, and places of employment for two areas within the project boundary. One is located on Mullanphy Street and the other located on North Market Street. The report also provides requested photographic documentation for these areas and information on associated outbuildings and a brick street. Please let us know if you have any questions regarding the occupant history information and/or photographic documentation contained within the attached report.

USACE is holding another face-to-face consultation meeting on December 9, 2015 at 9 am. The meeting will be held at the N2W Program Management Office, which is located at the USACE St. Louis District Service Base, 100 Arsenal St. Building 7, St. Louis, Missouri 63118. If you have any questions or need additional information, please contact myself at (816) 389-3841.

Sincerely,

Laurie Farmer

NEPA Project Manager

cc: Amanda Burke, Missouri State Historic Preservation Office Lori Price, CH2M Hill Betsey Bradly, St. Louis Development Corporation Thomas Reynolds, National Geospatial-Intelligence Agency Milford Wayne Donaldson, FAIA Chairman

Teresa Leger de Fernandez Vice Chairman

John M. Fowler Executive Director



Preserving America's Heritage

December 8, 2015

Mr. Robert Cardillo Director National Geospatial-Intelligence Agency 7500 GEOINT Drive Springfield, VA 22150

Ref:

Next NGA West (SHPO Project Number 038-SLC-14) St. Louis County (MO), St. Clair County (IL)

Dear Mr. Cardillo:

In response to a notification by the National Geospatial-Intelligence Agency, the Advisory Council on Historic Preservation (ACHP) will participate in consultation to develop a Programmatic Agreement for the proposed Next NGA West campus. Our decision to participate in this consultation is based on the *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, contained within our regulations. The criteria are met for this proposed undertaking because it has the potential to present questions of policy and interpretation.

Section 800.6(a)(1)(iii) of our regulations requires that we notify you, as the head of the agency, of our decision to participate in consultation. By copy of this letter, we are also notifying Mr. Thomas J. Bukoski, ACIP, Deputy Director Next NGA West Program Management Office & Director Facility Program Office, of this decision.

Ms. Katharine Kerr, who can be reached at (202) 517-0216 or kkerr@achp.gov, will handle our participation in this consultation. We look forward to working with NGA and other consulting parties to develop this agreement.

Sincerely,

John M. Fowler Executive Director



December 8, 2015

Mr. Thomas J. Bukoski, AICP Director Facility Program Office Security and Installations Directorate National Geospatial-Intelligence Agency Mail Stop S81-SIF 7500 GEOINT Drive Springfield, VA 22150-7500

Ref: Next NGA West (SHPO Project Number 038-SLC-14)

St. Louis County (MO), St. Clair County (IL)

Dear Mr. Bukoski:

On October 23, 2015, the Advisory Council on Historic Preservation (ACHP) received a response to our April 22, 2015 letter requesting additional information regarding the proposed vacation of the South 2nd Street facility (known as the St. Louis Arsenal) and the identification, construction, and operation of a new facility for the National Geospatial-Intelligence Agency (NGA), referred to as Next NGA West. Thank you for providing additional information as requested. Given the responses provided, the ACHP has decided that our participation is warranted and has notified the Director of the NGA of our participation. Additionally, as we are now a consulting party in this Section 106 consultation process, we wish to provide additional comments/recommendations on how to proceed under the regulations implementing Section 106 of the National Historic Preservation Act, "Protection of Historic Properties" (36 CFR Part 800).

Because (1) there are different lead agencies for the relocation and reuse/disposal of the St. Louis Arsenal, (2) nothing in NGA's relocation decision commits the 375th Air Mobility Wing (375 AMW) to a future course of action; and (3) we anticipate the necessity of mitigation measures to resolve adverse effects to historic properties while reuse/disposal is accomplished, the NGA and the 375 AMW believe there are two separate undertakings, similar to the United States Coast Guard's (USCG) approach for the closure and disposal of the Support Center on Governors Island, NY.

In Knowles v. United States Coast Guard, 1997 WL 141397 (S.D.N.Y. 1997), the Plaintiffs claimed that the USCG improperly "segmented" its environmental review process in order to avoid the National Environmental Policy Act's (NEPA) requirement of preparing an Environmental Impact Statement because they saw it as a foreseeable event that the USCG would "dispose" of the property after the Support Center was closed. Therefore, they argued, the actions of disposal and closure were interdependent. The court stated that "only when a given project effectively commits decision makers to a future course of action will this form of linkage argue strongly for joint environmental evaluation." Based on the evidence presented, the district court found that the closure of the Support Center did not commit the property either to disposal or to the sale and re-development anticipated by plaintiffs. In view of these

circumstances, the court determined that the USCG did not segment the project in order to circumvent any provisions of NEPA.

Given past precedent, and NGA's intent to integrate the NEPA and Section 106 processes, the ACHP accepts the decision by NGA that the consideration of vacation and reuse of its current facility is a separate undertaking from the construction of a new facility under Section 106. As such, we see the current undertaking for this consultation to be the following:

NGA is investigating sites for the construction and operation of the Next NGA West in the greater St. Louis metropolitan area to replace mission critical facilities at the current St. Louis Arsenal, which has exceeded service life and can no longer support the technology changes required for the NGA mission.

Letters, documents, and emails may have been unclear and confusing to some parties with respect to which agency is the lead federal agency for this Section 106 process. According to our regulations it is the statutory obligation of the federal agency proposing the undertaking to fulfill requirements of Section 106 and to ensure that an agency official with jurisdiction over an undertaking takes legal and financial responsibility for Section 106 compliance (36 CFR § 800.2(a)). As NGA is on record for stating that it will make the decision on the site for the Next NGA West and will sign the necessary Record of Decision under the NEPA process, we acknowledge NGA as the lead federal agency. If NGA wishes to relinquish its legal and financial responsibilities to the Kansas City District under Section 106, and the U.S. Army Corps of Engineers wishes to be the lead federal agency, each agency must do so in writing and provide this notification to all consulting parties. Because the reuse and/or disposal of the St. Louis Arsenal has been determined a separate undertaking, the ACHP sees the role of the 375 AMW as a cooperating agency in this Section 106 process. Specifically, their role will be to address the portions of the undertaking for continued maintenance of the property.

We have reviewed the draft Programmatic Agreement (PA) provided to consulting parties by the Kansas City District. Given the nature of this particular undertaking, and that alternatives to avoid, minimize, or mitigate adverse effects will be implemented only for this site selected for the Next NGA West campus, it is recommended that the PA be structured to address each alternative individually and outline those actions that NGA will undertake if that alternative is selected. The administrative stipulations will address the undertaking as a whole. We will be providing our written comments on the draft PA after the scheduled consultation meeting on December 9, 2015.

If you have any questions, please contact Ms. Katharine R. Kerr at (202) 517-0216 or via e-mail at kkerr@achp.gov.

Sincerely,

Brandi M. Carrier Assistant Director

Office of Federal Agency Programs Federal Real Property Management



TRIBAL HISTORIC PRESERVATION OFFICE

Date: December 11, 2015 File: 1516-664MO-10

RE: USACE, National Geospatial-Intelligence Agency building, St. Louis, MO, and St. Clair

County, IL

USACE, St. Louis District Roberta Hayworth 1222 Spruce Street St. Louis, MO 63103-2833

Dear Ms. Hayworth,

The Osage Nation Historic Preservation Office has received and reviewed the draft EIS for the new National Geospatial-Intelligence Agency building in the St. Louis area. We apologize for our late response.

We have two major issues with the draft EIS. First, on page 3-86, lines 31-32 state, "To date, the tribes historically affiliated with the areas have not identified any tribal cultural resources in or near the alternative APEs." This statement is not accurate. On January 22, 2015, our office sent you an email that said, "The North St. Louis City Site is near the Osage Mississippi River Trail." On August 11, 2015, our office sent another email that said, "We would also like to emphasize that the North St. Louis location has the highest likelihood to encounter ancestral Osage sites, as it is near the Osage Mississippi River Trail and the Mississippi River itself." The Mississippi River Trail is a tribal cultural resource in or near the North St. Louis APE.

Second, the EIS states that the Fenton and Mehlville sites will have no/negligible impacts to cultural resources. However, the cultural resource survey reports from May recommended trenching at the Fenton site and a Phase 1 survey for the Mehlville site. We concur with the recommendations of the reports, not the EIS for these sites. We do concur that the North St. Louis site and St. Clair County site would cause major, negative, long-term impacts to cultural resources at these sites.

Should you have any questions or need any additional information, please feel free to contact me at the number listed below. Thank you for consulting with the Osage Nation on this matter.

John Fox Archaeologist

Koenig, Chris J MVS

From: John Fox <jfox@osagenation-nsn.gov>
Sent: Tuesday, January 05, 2016 3:00 PM

To: Hayworth, Roberta L MVS

Cc: Andrea Hunter; Koenig, Chris J MVS

Subject: [EXTERNAL] FW: National Geospatial-Intelligence Agency Campus

Here is the email I sent to you on January 22. The other will be sent shortly.



John Fox

Archaeologist 627 Grandview Avenue, Pawhuska, OK 74056

Phone: 918-287-5274 jfox@osagenation-nsn.gov

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From: John Fox

Sent: Thursday, January 22, 2015 1:18 PM **To:** 'roberta.l.hayworth@usace.army.mil'

Cc: Andrea Hunter

Subject: National Geospatial-Intelligence Agency Campus

Dear Ms. Hayworth,

The Osage Nation Historic Preservation Office has received a notification regarding the new National Geospatial-Intelligence Agency campus in the St. Louis region. All four of the proposed locations are highly sensitive areas for the Osage Nation, and we would like to participate in tribal consultation with you on this project. We would request cultural resource surveys for any of these locations. The North St. Louis City Site is near the Osage Mississippi River Trail, and is likely the most sensitive location for the Osage Nation. Additionally, this location incorporates the former Pruitt-Igoe site. This is not a direct concern for the Osage Nation, but it is likely an important recent historical archaeological site, especially for the African American community in the St. Louis area.

Thank you for consulting with the Osage Nation,

John Fox Archaeologist I Osage Nation Historic Preservation Office 627 Grandview Pawhuska, OK 74056 (918)287-5274 ifox@osagenation-nsn.gov

Koenig, Chris J MVS

From: Sent: John Fox <ifox@osagenation-nsn.gov> Tuesday, January 05, 2016 3:00 PM

To:

Hayworth, Roberta L MVS

Cc:

Andrea Hunter; Koenig, Chris J MVS

Subject:

[EXTERNAL] FW: NGA West Cultural Resource Surveys

John Fox Archaeologist

627 Grandview Avenue, Pawhuska, OK 74056

Phone: 918-287-5274

ifox@osagenation-nsn.gov <mailto:ifox@osagenation-nsn.gov>

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From: John Fox

Sent: Tuesday, August 11, 2015 9:13 AM

To: 'Hayworth, Roberta L MVS'

Cc: Andrea Hunter

Subject: NGA West Cultural Resource Surveys

Dear Ms. Hayworth,

The Osage Nation Historic Preservation Office has received and reviewed the Cultural Resource Survey reports for the Next NGA West Project that you provided. We concur with the recommendations Brockington provided for each location (trenching in Fenton, Phase 1 for Mehlville, Phase 1 for North St. Louis, and avoidance of 11S825 in St. Clair County). We would also like to emphasize that the North St. Louis location has the highest likelihood to encounter ancestral Osage sites, as it is near the Osage Mississippi River Trail and the Mississippi River itself. This is in an area with high probability for Late Woodland through Mississippian period sites, including sacred sites, such as mound and burial locations. Therefore, the Osage Nation requests that the North St. Louis site be avoided.

Also, I apologize for not getting back to you about the Desloge Bank Stabilization project. The last month has been extremely busy here. We have no concern for the project, that I believe has already been permitted, and I will send our letter today. Thank you for providing all of the information to help make that decision.

Thank you for consulting with the Osage Nation,

John Fox

Archaeologist

Osage Nation Historic Preservation Office

627 Grandview

Pawhuska, OK 74056

(918)287-5274

jfox@osagenation-nsn.gov <mailto:jfox@osagenation-nsn.gov>

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DEPARTMENT OF THE ARMY

CORPS OF ENGINEERS, KANSAS CITY DISTRICT 635 FEDERAL BUILDING 601 E 12TH STREET KANSAS CITY MO 64106-2824

Director Toni Prawl Deputy State Historic Preservation Officer Missouri Department of Natural Resources P.O. Box 176 Jefferson City, MO 65102

January 5, 2015

RE: SHPO Project Number: 038-SLC-14, Scope of work submittal for the archeological surveys, St. Louis City, Missouri (NGA)

Dear Dr. Prawl,

Enclosed you will find a formal physical submission of the scope of work for an initial archeological survey to be performed at the St. Louis City Site, a project location under consideration for the construction and operation of the National Geospatial-Intelligence Agency campus in the St. Louis Metropolitan area. The St. Louis Development Corporation (SLDC) and the City of St. Louis, through MWH, has procured the Archaeological Research Center of St. Louis, Inc. (ARC) to develop the scope and conduct the survey. This scope was initially shared by Ms. Betsy Bradley on behalf of the SLDC via email in November 2015. It has been revised to reflect some of the Missouri State Historic Preservation Office's initial comments previously documented in an email from Ms. Judith Deel on December 1, 2015 (enclosed). We have also provided some responses to her comments in this letter. Please accept the revised scope of work intended to initiate the team's understanding of the area's archeological resources. Responses to Ms. Deel's initial comments are below:

1) "There is no mention of tribal comment on the proposed project or on the proposed scope."

This scope of work mainly addresses the depth and frequency of historic-era deposits, and at this time ARC, through SLDC, will not perform deep testing for prehistoric archeology exploration. The development of an archeological context and deep testing plan will occur in consultation with the Tribes after site selection.

"The project should also be conducted and reported in conformance with the Secretary
of the Interior's Standards for Archaeology and Historic Preservation; and with Missouri
guidelines for archaeology."

SUBJECT: SHPO Project Number: 038-SLC-14, Scope of work submittal for the archeological surveys, St. Louis City, Missouri (NGA)

A reference that the scope will be carried out in conformance with the Secretary of the Interior's Standards for Archaeology and Historic Preservation and with Missouri guidelines for archaeology has been added to the text.

3) "More effort should be put into providing a prehistoric summary and developing research questions for prehistoric archaeology."

The attached scope of work reflects the initial steps toward developing those research questions and creating a full archeological testing strategy. SLDC is trying to get a "jump start" on documenting the historic archeological resources within this project site, but it is one of four sites that remain in contention for the NGA West site selection. There may be additional archeological testing in the future, depending on if the site is selected. If the St. Louis City site is selected, we will maintain contact with your office regarding reporting and the development of a subsequent testing strategy.

We thank you for your initial feedback on the scope in December 2015, and now request concurrence to move forward with the attached scope for the St. Louis City alternative. Please feel free to reach me at 816-389-3841 if you have any additional comments or questions.

Sincerely,

Laurie Farmer

NEPA Project Manager

Enclosures

cc: Amanda Burke, Missouri State Historic Preservation Office Katharine Kerr, Advisory Council on Historic Preservation Lori Price, CH2M Hill Thomas Reynolds, National Geospatial-Intelligence Agency Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

January 20, 2016

Laurie Farmer
Corps of Engineers, Kansas City District
635 Federal Building
601 E 12th St
Kansas City, MO 64106

Re:

SHPO Project Number: **038-SLC-14**, Section 106 review of NGA project review of Proposal for Archaeological Testing, St. Louis City, Missouri (NGA)

Dear Ms. Farmer:

Thank you for providing us with the revised January 6, 2016 document entitled *Proposal to Conduct Archaeological Testing of the Proposed National Geospatial-Intelligence Agency Facility, City of St. Louis, Missouri.* We look forward to the opportunity to review the results of the field investigations, which we understand that this phase is focused on the historic period.

If you have any questions please write Missouri Department of Natural Resources, State Historic Preservation Office, Attn: Review and Compliance, P.O. Box 176, Jefferson City, Missouri 65102, or call Amanda Burke (573) 522-4641. Please be sure to include the **SHPO Project Number (038-SLC-14)** on all future correspondence relating to this project. If the information is provided via telephone call, please follow up in writing for our files.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

Toni M. Prawl, PhD Director and Deputy

State Historic Preservation Officer

TMP:ab

C: Erwin Romer, USAF Mark McMoy, USAF Katharine Kerr, ACHP Betsy Bradley, CRO